Personally Identifying Information Checklist

HOUSING AND COMMUNITY DEVELOPMENT
CALIFORNIA

I. PII: Subrecipient Monitoring Checklist

This checklist can be used to determine whether a subrecipient's (or sub-subrecipient's) PII policy meets the requirements of this Policy. Note that this checklist only applies to the items required by this Policy; it does not address items that are encouraged by this Policy.

___ PII is not collected unless it is required.

___ When PII is collected, only the information needed is collected.

___ There is a process for ensuring a staff person is authorized to collect PII.

___ PII is discussed only on a 'need to know' basis.

___ PII is prohibited from discussion or release without authorization.

___ Meetings where PII might be discussed are held only in secure spaces.

___ Meeting minutes are treated as confidential until and unless staff verify that they do not contain PII.

___ Meetings that include PII have their date, time, place, subject, chair, and attendees recorded.

___ PII is not left in voicemails or texts.

___ PII is not sent via unencrypted email.

___ All files containing PII are clearly labeled and stored in lockable containers.

___ There is a process for ensuring PII is not left unattended in open access areas.

___ There is a process for ensuring PII is not accessed except in secure locations and on secure computers.

___ There is a centralized record of where PII is stored and a process for periodically reconciling the record to actual storage.

___ There is a process for centrally storing digital records containing PII, a centralized record of those files, and a process for periodically assessing whether files are being stored in accordance with that process.

___ PII is not removed from authorized facilities without approval.

___ There is a process for sending physical PII that excludes translucent envelopes, interoffice envelopes, and single-wrapped envelopes sent via postal mail; when sent by courier, this process requires a recipient signature.

___ There is a process for faxing PII that requires confirming the recipient's number, confirming the recipient is able to receive the fax, confirming they receive the fax, and ensuring that the sender transmission is destroyed after sending and that the fax machine does not maintain a record of it.

___ There is a process for emailing PII that requires confirming the recipient email address and confirming receipt, sending email only between encrypted servers or, if not possible, sending PII exclusively in encrypted files.

___ PII is not stored on shared drives, calendars, or any other unsecured or publicly accessible location on the internet or intranet.

___ Records containing PII are not maintained longer than required by ESG federal or subrecipient agency policy absent exceptional circumstances.

___ Records containing PII are permanently destroyed.

___ There is a policy for responding to data breaches that, at minimum, involves re-securing the information.

Appendix A: Changelog

Date Effective	Description
5.23.2022	Updated draft into new format