

For: FSA Employees and Contractors

Requirements for Shipping PII Through Physical Transportation Systems

Approved by: Deputy Administrator, Management



1 Overview

A Background

All USDA employees and contractors are responsible for protecting the privacy of USDA employees, contractors, and customers. This responsibility includes ensuring that PII is moved through physical transportation systems in a manner designed to safeguard PII from accidental loss and/or inadvertent disclosure.

Note: Physical transportation means moving information through non-electronic shipping or delivery systems; for example, intrafacility mail, courier service, FedEx, United Parcel Service (UPS), or USPS.

B Purpose

This notice provides FSA requirements for shipping PII through physical transportation systems.

C Contact

If there are questions about this notice, contact John W. Underwood, Privacy Act Officer/ PII Officer at either of the following:

- e-mail to john.underwood@kcc.usda.gov
- telephone at 816-926-6992.

Disposal Date	Distribution
November 1, 2009	All FSA employees and contractors; State Offices relay to County Offices

2 Responsibilities, Requirements, and Procedures

A Supervisor/Manager or Designated Representative Responsibilities

Entering PII into a physical transportation system shall indicate that the sending office supervisor/manager or designated representative (authorized by management):

- is fully aware of actual PII contained within the shipment and can identify in detail:
 - individuals about whom the record pertains
 - PII data types

Note: This level of knowledge is required in case the shipment is accidentally lost or inadvertently disclosed. If loss and/or disclosure occur, the sending office manager or designated representative will be **required** to identify the **specific** contents of the shipment to the PII incident investigation group.

- approves entering PII into the physical transportation system
- accepts full responsibility and accountability for entering PII into a physical transportation system
- has ensured that electronic media containing PII (data tapes, DVD's, CD's, etc.) has been encrypted (providing data system allows encryption).

Important: The electronic media decryption key shall:

- **not** be included in the same shipment
- be provided by e-mail or telephone **only after** the receiver confirms receiving the shipment.

B Physical Transportation System Requirements

The physical transportation system used for shipping PII shall offer:

- a positive chain of custody
- the ability to track shipment:
 - pickup
 - receipt
 - transfer
 - delivery.

2 Responsibilities, Requirements, and Procedures (Continued)

C General Physical Transportation Procedures

When sending PII through a physical transportation system (for example, intrafacility mail, courier service, FedEx, UPS, or USPS) the sending office shall prepare and use **2** (double-seal) opaque containers (envelope, pouch, package, and/or box) for **each** shipment. The outer container may be a container that has been provided by the shipping vendor (for example, FedEx, UPS, or USPS). Using new (**not** previously used) envelopes, pouches, packages, or boxes is preferred. Prepare the containers as follows:

Note: Certain containers are in good enough condition to be used for more than 1 shipment. However, reusing envelopes, pouches, packages, and boxes poses a risk. The sending office has the responsibility to ensure that any reused container will remain intact during the physical transportation process.

- label **both** containers (inner and outer) with the name and address of the:
 - recipient
 - sender

Note: Under **no** circumstances should the inner or outer container be externally labeled to indicate or identify that the shipment contains PII.

- ensure that the 2 containers are sealed to prevent inadvertent opening and will readily show any signs of tampering.

D Specific Physical Transportation Requirements

The following types of shipment **shall be individually** identified with a label stating, "U.S. Government Property, If Found Return To (sender's name and address)."; place the label:

- directly on electronic media containing PII; for example, System 36/AS 400 data tapes, DVD's, and CD's
- on the outside of each box being shipped to FRC.

E Shipment Cost Analysis

The sending office shall be responsible for performing a cost analysis to determine, and then use, the most cost effective method for shipping PII through the approved physical transportation shipment methods.

3 Approved Shipment Methods

A Intrafacility Mail

PII may be transported by the normal Government sponsored intrafacility mail process. Intrafacility mail includes the Government sponsored mail process that moves mail inside single facilities and among separate facilities that are in close physical proximity to each other (for example, compound-style buildings/facilities in the same city that are supported by the same mailroom).

B Hand Carry

PII may be transported by hand from an individual/office directly to another individual/office.

C Courier Service

The sending office may contract with a licensed/bonded courier service to transport PII. The sending office is responsible for ensuring that the courier service performs PII transport in a manner that will meet the stated requirements.

D Physical Transport Service Providers

The approved PII physical transport service providers are:

- FedEx
- UPS
- USPS.

4 FedEx

A FedEx Blanket Purchase Agreement (BPA)

USDA has negotiated BPA with FedEx. All USDA FedEx account holders will automatically receive BPA discounts. FedEx mailing supplies will be provided free of cost to FSA offices covered by BPA.

Cost analysis indicates that because of BPA, FedEx is the preferred PII physical transport service provider. FSA offices may activate the FedEx BPA by calling 800-645-9424 and providing the office's FedEx account number. FSA offices will be responsible for discussing payment options and making payment arrangements with FedEx.

If an office does **not** have a FedEx account, an account can quickly be established by contacting Monica Fleischmann, FedEx Worldwide Account Manager, Government Sales at telephone 703-866-2014.

4 FedEx (Continued)

B FedEx Shipment Procedures

FedEx has indicated that, whenever possible, FSA offices should use the web site at **www.fedex.com** to arrange for shipment. Using the web site will enhance the ability of FedEx and the sending/receiving office to automatically track the shipment. When providing the requested/required information on the web site, FSA offices shall include as much detail as possible, including the following:

- name
- address
- phone number
- e-mail address of both the sender/receiver (needed for FedEx automated e-mail alerts).

The FedEx BPA has 5 shipment options available. The option selected will depend on the speed of delivery required by the sending office. The 5 options are as follows:

- FedEx Priority Overnight (used when the shipment must be at the destination by 10:30 a.m. the next business day)
- FedEx Standard Overnight (used when the shipment must be at the destination by 3 p.m. the next business day)
- FedEx 2Day (used when the shipment must be at the destination within 48 hours)
- FedEx Express Saver (3 Day) (used when the shipment must be at the destination within 72 hours)
- FedEx Ground (used for less time sensitive shipments that do **not** typically contain sensitive material).

Notes: Because the purpose and tracking methodology is different for shipments by FedEx Ground, it should **seldom be used for shipping PII**.

However, FedEx Ground **shall be used** for boxes sent to FRC's and for shipping boxes that weigh more than 25 pounds. FSA offices will need to provide boxes for shipments being made by FedEx Ground.

5 UPS and USPS

A UPS

UPS has 1 delivery option available for PII shipments. The sending office shall specify UPS Other Accessorial Service, "Delivery Confirmation - Signature Required".

5 UPS and USPS (Continued)

B USPS

USPS has 1 delivery option available for PII shipments. Only USPS Express Mail (Overnight) offers a positive chain of custody and the ability to track shipment pickup, receipt, transfer, and delivery. FSA offices shall take note of the cost associated with using USPS Express Mail.

6 Additional Shipping Information

A Notification of PII Shipment

Before entering PII into a physical transport system (for example, intrafacility mail, courier service, FedEx, UPS, or USPS), the sending office shall do **both** of the following:

- **contact** the intended recipient by e-mail or telephone to let the individual/organization know that a shipment containing PII is being sent
- **provide** the intended recipient with a description of PII being shipped and the scheduled PII shipment delivery date/time.

B Tracking PII Shipments

When shipping PII by a physical transport service provider (for example, FedEx, UPS, or USPS), the sending office **shall actively track** shipment pickup, receipt, transfer, and delivery. This can be accomplished using automated tracking systems sponsored by FedEx, UPS, or USPS (e-mail notification, web site posting, etc.).

C PII Shipment Followup

When shipping PII by a physical transport system (for example, intrafacility mail, courier service, FedEx, UPS, or USPS) the sending office **shall followup** to ensure that the PII shipment was received by the intended recipient. Followup shall occur within **1 workday** after the scheduled PII shipment delivery date/time.

Note: Followup may be accomplished **only** by personal contact with the recipient.

6 Additional Shipping Information (Continued)

D Delivery Confirmation Requirements for PII Shipments

If delivery of the PII shipment is:

- confirmed, the sending office need **not** take any additional action
- **not** confirmed within 1 workday after the scheduled PII shipment delivery date/time, the sending office **shall report** the possible loss or compromise of PII to the 24-hour support Security Incidents Hotline at either of the following:
 - 888-926-2373
 - 877-PII-2YOU.

7 USPS First-Class Mail Exception

A Routine Business Envelopes Containing PII

Based on PII risk assessments/cost considerations, it is standard practice in the Federal Government for certain PII to be physically transported using USPS First-Class Mail. Standard USPS First-Class Mail applies to **envelopes only**, not a pouch, package, or box.

FSA routine business envelopes containing PII can include, but are **not** limited to:

- CCC-1099's
- FSA documents sent out for signature
- FSA personnel data/administrative correspondence (includes SF-50)
- FSA/producer correspondence
- IRS 1098's
- IRS 1099's
- production reports
- transaction statements.

B USPS First-Class Mail Specifications

USPS First-Class Mail letters are small rectangular mail pieces at least 3-1/2 inches high x 5 inches long x .007 inch thick, no more than 6-1/8 inches high x 11-1/2 inches long x 1/4 inch thick, with a maximum weight of 3.5 ounces.

USPS First-Class Mail large envelopes are at maximum 12 inches high by 15 inches long by 3/4 inches thick.

7 USPS First-Class Mail Exception (Continued)

C PII Packaging/System Requirements Not Applicable

When physically transporting PII using USPS First-Class Mail, there are **no** requirements for using the following:

- 2 envelopes (**no** double-seal)
- a physical transportation system providing a positive chain of custody or the ability to track shipment pickup, receipt, transfer, and delivery
- notification, followup, or confirmation of receipt.

D Using Standard PII Physical Transportation Process

Even when an envelope qualifies for physical transportation using USPS First-Class Mail, the sending office can make the determination to enter the envelope into the standard PII physical transportation process (FedEx, UPS, USPS).

Example: Sending offices can use the standard PII physical transportation process whenever the documentary material is of such importance that the envelope merits the protection offered by the standard PII shipment transportation process.

8 Special Requirements

A System 36/AS 400 Data Tape Shipments

FedEx shall be used for shipping System 36/AS 400 data tapes. UPS and USPS shall be used for shipping System 36/AS 400 data tapes **only** if FedEx is unavailable.

Notice AS-2188

8 Special Requirements (Continued)

B Preparing System 36/AS 400 Data Tapes for Shipment

Before shipping System 36/AS 400 data tapes, offices shall ensure that:

- appropriate Volume Table of Contents (VTOC) listing has been developed and has been included in the package containing the System 36/AS 400 data tape
- System 36/AS 400 data tape and VTOC listing has been placed in a new (unused) opaque envelope, package, or box; reusing envelopes, packages, or boxes **is not authorized** when shipping System 36/AS 400 data tapes
- sender performs the following:
 - notifies receiver to expect delivery of the System 36/AS 400 data tape (an expected delivery date shall be provided)
 - contacts receiver on, but **not to exceed** 1 workday after, the expected delivery date to confirm the System 36/AS 400 data tape has successfully reached the intended destination.

C Shipping System 36/AS 400 Data Tapes to Kansas City

Use the following address when shipping System 36/AS 400 data tapes to Kansas City:

Robert Bonacker
USDA-FSA-IPUSO
Beacon Facility - Mail Stop 8420
9240 Troost Ave
Kansas City MO 64131-3055
Telephone: 816-926-1179.

D Reporting Loss/Suspected Compromise of PII

Employees or contractors with any reason to suspect that PII has been lost or compromised **shall report** concerns within 1 workday of becoming aware of the issue. Contact the 24-hour support Security Incidents Hotline at either of the following:

- 888-926-2373
- 877-PII-2YOU.