

Privacy and Security Basics for CDSME Data Collection



National Council on Aging

Training for CDMSE Data Collection Overview

- Purpose of the Privacy Act
- Primary Features of the Act
- Who Needs Privacy Training?
 - Master Trainers and Lay Leaders
 - Program Coordinators and Data Collection/Data Entry Personnel
- Types of Information Protected by the Act
- Disclosure
- Safeguarding, Transporting and Disposing of PII
- Roles and Responsibilities
- Test Questions



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Privacy Act of 1974 Public Law 93-579 (5 U.S.C.A. 552a)

- Purpose: to protect records that can be retrieved by personal identifiers such as a name, social security number, or other identifying number or symbol.
- The act was created in response to concerns about how the use of computerized databases might impact individuals' privacy rights.
 - requires government agencies to show individuals any records kept on them
 - requires agencies to follow "fair information practices," when gathering and handling personal data.
 - places restrictions on how agencies can share an individual's data with other people and agencies.
 - lets individuals sue the government for violating of these provisions <http://epic.org/privacy/1974act/>



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Who Needs to Be Trained?

- If your work involves the management of sensitive information, PII (Personally Identifiable Information), or protected health information, you need to ensure you are taking precautions to protect it from unauthorized access/disclosure, theft, loss and improper disposal
 - Employees, Managers
 - Supervisors, Coordinators
 - Master trainers (MTs)
 - Peer Leaders, including volunteers who are involved in the collection, handling, and/or data entry of Personally Identifiable Information (PII) on individuals participating in CDSME



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What Type of Training is Needed?

- Training for program coordinators and program implementers
 - The rights of individuals participating in CDSME
 - The appropriate protection of PII shared by CDSME participants at the workshop level
 - The appropriate storage and transfer of participant forms
- Training for individuals completing data entry and data transfer
 - The appropriate protection of PII shared by CDSME participants at the workshop level
 - The appropriate storage, transfer and possible destruction of data forms
 - Security requirements for electronic data transfer, storing and degaussing (destruction)



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Types of Information Covered by the Privacy Act

- **Sensitive:** if the loss of confidentiality, integrity, or availability could be expected to have a serious, severe or catastrophic adverse effect on organizational operations, organizational assets or individuals.
- **Protected Health Information:** Individually identifiable health information that relates to a person's past/present/future physical/mental health, health care received, or payment.

<http://irtsectraining.nih.gov/publicUser.aspx>



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Information Protected by the Privacy Act

PERSONALLY IDENTIFIABLE INFORMATION (PII)

- Home address
- Home telephone number
- Complete date of birth
- Personal medical information
- Social Security Number (including just the last four digits of SSN)
- Personal/private information (if the information can uniquely identify the individual)
- Photographs
- Education records
- Financial transactions
- Employment history



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Information Protected by the Privacy Act

PERSONALLY IDENTIFIABLE INFORMATION (PII)

"the term Personally Identifiable Information means any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual."

<http://www.gsa.gov/portal/content/104276>



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Disclosure

- No agency or person shall disclose:
 - any record
 - by any means of communication
 - to any person or another agency
 - without a written request or prior written consent of the individual to whom the record pertains
- "any means of communication" includes oral (phone, in-person), written and electronic (emails, faxes, texts, tweets, pins, etc.)

http://www.dodea.edu/upload/2011_patrainingslides.pdf



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Safeguarding PII

- PII must always be treated as "FOR OFFICIAL USE ONLY" and must be marked accordingly.
- This applies not only to paper records (including e-mail, faxes, etc., which must contain the cautionary marking "FOR OFFICIAL USE ONLY – FOUO").
- All records containing PII should be stored in locked filing cabinets or other secure containers to prevent unauthorized access.
- Electronic records must be password protected and be transferred via encrypted e-mail.



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Transporting PII

- Hand Carrying
 - Use a Cover sheet to shield contents
- Using Mail
 - Use manila or white envelopes
 - Mark the envelope to the attention of the authorized recipient
 - Never indicate on the outer envelope that it contains PII
- Using E-mail:
 - Password protect personal data placed on shared drives, the Internet or the Intranet
 - Use encrypted e-mail
 - Do not send PII to a personal, home or unencrypted e-mail address
 - Announce in the opening line of the text (NOT the subject line) that FOUO information is contained

http://www.dodea.edu/upload/2011_patrainingslides.pdf



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Disposing of PII

- A disposal method is considered adequate if it renders the information **unrecognizable** or **beyond reconstruction**.
- Disposal methods may include:
 - Burning
 - Melting
 - Chemically decomposing
 - Pulping
 - Pulverizing
 - Shredding
 - Mutilating
 - Degaussing (erasing from magnetic field or disc)
 - Deleting/Emptying Recycle Bin

www.dla.mil/.../Privacy%20Act%20103%20Safeguarding%20Privacy%20



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Your Role and Responsibility

- Take privacy protection seriously
- Respect the privacy of others
- Ensure messages, faxes and e-mails that contain personal information are properly marked and e-mail is encrypted
- Don't share PII with individuals who are not authorized
- Have appropriate transfer, storage and disposal protocols in place for PII
- Do not e-mail PII to personal, home or unencrypted accounts



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Your Role and Responsibility

- All individuals involved in **providing CDSME programs** must sign Non-Disclosure Agreements
- All individuals involved in **data collection, data transfer** and/or **data entry** must sign Non-Disclosure Agreements
- Non-Disclosure Agreements will be maintained for 3-years after the end of the grant and stored by the state leader or the state's designee for data collection/data entry



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Master Trainers and Lay Leader Role

- Use the CDSME Peer Leader Script at a Class Zero pre-session or at the start of Session 1 and with any new participants who start at Session 2
 - The script explains why participant data is being collected and how it will be kept secure
- Emphasize that completing the Participant Information Form is voluntary
 - Individuals may skip any questions they do not want to answer
 - Individuals may choose to not complete the Form, but they can still participate in the program



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Program Coordinator/Data Entry Roles

- Store completed CDSME forms in a secure, locked cabinet when not in use
- Enter data into secure, password protected database, such as the CDSME database
- Store in secure, locked cabinet after data is entered, if data is not destroyed
- Data should be destroyed after entered into the CDSME database, **IF** it is not going to be stored in a secure, locked cabinet thereafter



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Test Questions – Circle all correct answers

1. Information about an individual that is unique, or identifies or describes him or her (such as Social Security Number, medical history, date of birth, home address) is called:
 - a. Interesting
 - b. Record
 - c. Data
 - d. Personally Identifiable Information



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Test Questions – Circle all correct answers

2. Disposal methods may include all except:
 - a. Burning
 - b. Shredding
 - c. Tearing in half and putting in the garbage can
 - d. Melting



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Test Questions – Circle all correct answers

3. The CDSME Peer Leader Script:

- a. Describes what participants will learn in the workshop
- b. Requests participants to share their birth date, address and sex
- c. Explains how participant privacy is protected and why data is being collected
- d. Emphasizes that participants are required to complete all forms



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Test Answer Code

- 1. d - Personally Identifiable Information
- 2. c - Tearing in half and putting in the garbage can
- 3. c - Explains how participant privacy is protected and why data is being collected



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Privacy and Security Basics Training Certificate

_____ (Name)

*Has Successfully Completed the
Privacy and Security Basics Training for
CDSME Program Implementation and Data Collection*

_____ Date