



STATE OF WISCONSIN

DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor
 Kathy Blumenfeld, Secretary
 Trina Zanow, Division Administrator
 Effective Date: 08/01/2024

270 - PERSONALLY IDENTIFIABLE INFORMATION PROCESSING AND TRANSPARENCY STANDARD

Purpose

The purpose of the Personally Identifiable Information Processing and Transparency Standard is to set forth requirements and expectations through the development of documentation related to and supporting standardized methods for how Personally Identifiable Information (PII) is accessed, processed, and shared within the State of Wisconsin computing environments.

Standard

Based on NIST SP 800-53 Rev. 5, DET's Standards address a diverse set of security and privacy requirements. As a currently established baseline for implementation, DOA utilizes all low level, and selected moderate level controls in support of its security posture initiatives. Agencies shall categorize their data and identify the potential impact (high, moderate, or low), and select controls appropriately as defined by Table 3-1 in NIST SP 800-53B for the allocated impact levels (high, moderate, low) of controls and control enhancements. Agencies shall update DET on the status of their baseline control implementation through the reporting and monitoring process.

Executive Branch Agencies shall develop policies, procedures, or processes for their own State information systems and system environments to protect State information, if applicable. **Note:** Some agencies have specific regulatory requirements to follow that go above and beyond the requirements for other agencies. Implementation of the standard controls within this document can be (1) a common (inheritable) control, (2) a system-specific control, or (3) a hybrid control. The control implementation defines the scope of applicability for the control, the shared nature or inheritability of the control, and the responsibility for control development, implementation, assessment, and authorization.

This standard contains the minimum baseline controls that Executive Branch agencies shall implement; however, those agencies may also be required to implement controls outside of the scope of the controls listed in this document.

BASELINE CONTROLS

Policy and Procedures (PT-1):

- Develop, document, and disseminate to appropriate agency personnel or roles:
 - A personally identifiable information processing and transparency policy that:
 - Addresses purpose, scope, roles, responsibilities, management commitment, coordination among agency entities, and compliance.
 - Is consistent with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines.
 - Procedures to facilitate the implementation of the personally identifiable information



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processing and transparency policy and the associated personally identifiable information processing and transparency controls.

- Designate appropriate agency personnel to manage the development, documentation, and dissemination of the personally identifiable information processing and transparency policy and procedures.
- Review and update the current personally identifiable information processing and transparency:
 - Policy on an agency-defined frequency.
 - Procedures on an agency-defined frequency.

Authority to Process Personally Identifiable Information (PT-2):

- Determine and document the agency-defined authority that permits the processing of personally identifiable information.
- Restrict the access of personally identifiable information to only that which is authorized.

Personally Identifiable Information Processing Purposes (PT-3):

- Identify and document the purpose(s) for processing personally identifiable information.
- Describe the purpose(s) in the public privacy notices and policies of the agency.
- Restrict the processing of personally identifiable information to only that which is compatible with the identified purpose(s).
- Monitor changes in processing personally identifiable information and implement mechanisms to ensure that any changes are made in accordance with agency-defined requirements.

Consent (PT-4):

- Implement tools or mechanisms for individuals to consent to the processing of their personally identifiable information prior to its collection that facilitate individuals' informed decision-making.

Privacy Notice (PT-5):

- Provide notice to individuals about the processing of personally identifiable information that:
 - Is available to individuals upon first interacting with the agency, and subsequently at an agency-defined frequency.
 - Is clear and easy-to-understand, expressing information about personally identifiable information processing in plain language.
 - Identifies the authority that authorizes the processing of personally identifiable information.
 - Identifies the purposes for which personally identifiable information is to be processed.
 - Includes agency-defined information.



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Specific Categories of Personally Identifiable Information (PT-7):

- Apply agency-defined processing conditions for specific categories of personally identifiable information.

Specific Categories of PII | Social Security Numbers (PT-7(1)):

- When a system processes Social Security numbers:
 - Eliminate unnecessary collection, maintenance, and use of Social Security numbers, and explore alternatives to their use as a personal identifier.
 - Do not deny any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his or her Social Security number.
 - Inform any individual who is asked to disclose his or her Social Security number whether that disclosure is mandatory or voluntary, by what statutory or other authority such number is solicited, and what uses will be made of it.

Specific Categories of PII | First Amendment Information (PT-7(2)):

- Prohibit the processing of information describing how any individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute or by the individual or unless pertinent to and within the scope of an authorized law enforcement activity.

Additional Documentation

- NIST SP 800-53B <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-53B.pdf>
- Wisconsin Statutes Chapter 19 General Duties of Public Officials, Subchapter IV PERSONAL INFORMATION PRACTICES <https://docs.legis.wisconsin.gov/document/statutes/subch.%20IV%20of%20ch.%2019>
- 5 USC 552a: Records maintained on individuals <https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title5-section552a&num=0&edition=prelim>
- Transparency: Wisconsin Statutes Chapter 19 General Duties of Public Officials, Subchapter II PUBLIC RECORDS AND PROPERTY <https://docs.legis.wisconsin.gov/document/statutes/subch.%20II%20of%20ch.%2019>
- Records of state offices and other public records. <https://docs.legis.wisconsin.gov/document/statutes/16.61>
- Statewide General Records Schedules <https://publicrecordsboard.wi.gov/Pages/GRS/Statewide.aspx>

Definitions

Executive Branch Agency - State of Wisconsin legislatively defined Departments and all customers of DET services, equipment, and/or technologies. Agency or State Agency may be used interchangeably with Executive Branch Agency.

State information - Any information/data that is created, accessed, used, stored, or transmitted by an Executive Branch Agency.



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State information systems and system environments - All equipment or services used to input, store, process, transmit, and output information, including, but not limited to network devices, servers, databases, printers, Internet, email, physical, virtual, cloud, and applications accessible to and/or managed by the agency.

Exception Process

Exceptions to any Executive Branch Agency’s Security Policies or Standards shall follow the Executive Branch Agencies Risk Procedure. This includes exceptions that are allowed by law (e.g., there is some public health data where consent, privacy notices, etc. are not required).

Document History and Ownership

This standard was developed as required by the State of Wisconsin Information Technology Security Policy Handbook, under the authority of Wis. Stat. § 16.971.

This standard is effective upon approval and publication until revised, updated, or retired.

Ownership for this standard is assigned to DOA, DET Bureau of Security. As such, the DOA, DET Bureau of Security is responsible for the maintenance, update(s), and review of this document annually before the anniversary of the effective date.

Version #	Revision or Review Date	Description of Change(s)	Reviewer/Author	Date Approved
1.0	06/24/22	Submitted to and approved by the IT Executive Steering Committee	Reviewer: ITESC Author: DOA/DET	06/24/22
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NOTE: Keep only the origination and the last 10 years of update information. Only notate prior three revisions. Include only interim/final revision statuses.



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Authorized and approved by:

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Signature

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Print/Type
Title

Date