



# STATE OF WISCONSIN

## DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
 Kathy Blumenfeld, Secretary  
 Trina Zanow, Division Administrator  
 Effective Date: 08/01/2023

## 270 - PERSONALLY IDENTIFIABLE INFORMATION PROCESSING AND TRANSPARENCY STANDARD

### Purpose

---

The Personally Identifiable Information Processing and Transparency Standard provides documentation of the requirements to achieve compliance with the Personally Identifiable Information Processing and Transparency Policy.

### Standard

---

This standard uses the NIST SP 800-53 Rev. 5 framework as the guideline to establish control objectives to address a diverse set of security and privacy requirements. Not all controls within NIST SP 800-53 Rev. 5 may be selected for the Statewide baseline policies and standards. Agencies must categorize their data and identify the potential impact (high, moderate, or low), and select controls appropriately. This standard uses Table 3-15 in NIST SP 800-53B for the allocated impact levels (high, moderate, low) of controls and control enhancements. At a minimum, all low controls are selected, and certain moderate controls are selected. Agencies are to reflect their controls through the quarterly reporting process to DOA-DET.

Executive Branch Agencies are to develop policies, procedures, or processes for their own State information systems and system environments to protect State information, if applicable. Some agencies will have specific regulatory requirements that they must adhere to that go beyond what other agencies would need to adhere to. 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 includes the minimum baseline controls that Executive Branch agencies are to adhere to. Agencies may have additional controls they must adhere to that are not listed here.

### 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; and
    - Is consistent with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines; and
  - Procedures to facilitate the implementation of the personally identifiable information processing and transparency policy and the associated personally identifiable information processing and transparency controls;
- Designate appropriate agency personnel to manage the development, documentation, and



# STATE OF WISCONSIN

## DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
Kathy Blumenfeld, Secretary  
Trina Zanow, Division Administrator  
Effective Date: 08/01/2023

dissemination of the personally identifiable information processing and transparency policy and procedures; and

- Review and update the current personally identifiable information processing and transparency:
  - Policy on an agency-defined frequency; and
  - 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; and
- 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); and
- 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; and
  - Includes agency-defined information.

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

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



# STATE OF WISCONSIN

## DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
 Kathy Blumenfeld, Secretary  
 Trina Zanow, Division Administrator  
 Effective Date: 08/01/2023

### 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; and
  - 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.

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

**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.



# STATE OF WISCONSIN

## DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
Kathy Blumenfeld, Secretary  
Trina Zanow, Division Administrator  
Effective Date: 08/01/2023

---

### Exception Process

---

Exceptions to any Executive Branch Agency's Security Policies or Standards must 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 Wisconsin State Statute 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.



# STATE OF WISCONSIN

## DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor  
 Kathy Blumenfeld, Secretary  
 Trina Zanow, Division Administrator  
 Effective Date: 08/01/2023

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
2.0	06/24/22	Reviewed with Agency Security Officers and IT Directors and changes were incorporated	Reviewer: ITESC Author: DOA/DET	06/24/22
3.0	07/14/23	Reviewed with Agency Security Officers and IT Directors and changes were incorporated	Reviewer: WI ISAC/Enterprise IT Author: DOA/DET/BOS	08/01/23

**NOTE:** Keep only the origination and the last 10 years of update information. Only notate prior three revisions. Include only interim/final revision statuses.

Authorized and Approved by:

Trina Zanow, CIO

DocuSigned by:  
  
 Signature

8/1/2023 | 1:49 PM CDT

Print/Type  
 Title

Date