

16 September 2021

MEMORANDUM FOR DISTRIBUTION

From: Navy Education Authorizing Official (EAO) for the Academically and Professionally Accredited Education Enterprise Enclave (AEEE).

Subj: STORING PERSONALLY IDENTIFIABLE INFORMATION (PII).

Ref: (a) DODI 5200.48 CONTROLLED UNCLASSIFIED INFORMATION (CUI), 06 Mar 2020.
(b) UNITED STATES NAVY HIGHER EDUCATION NETWORK CYBERSECURITY CONCEPT OF OPERATIONS, 23 Sep 2020.
(c) USNAINST 8510.03 ACQUISITION AND USE OF CLOUD SERVICES, 25 Apr 2016.
(d) USNAINST 5230.1 INFORMATION TECHNOLOGY AND CYBERSECURITY POLICY AND STANDARDS, 28 Jun 2018.
(e) NIST SP 800-122 Guide to Protecting the Confidentiality of Personally Identifiable Information (PII), Apr 2010.

1. The following policy governing operational behavior with respect to storing PII is established per reference (a) under the authority granted in reference (b):
 - a. "USNA data" is data collected or created by USNA faculty, staff, Midshipmen and other students as part of their official duties, some of which may be PII ("USNA PII").
 - b. USNA PII may be stored in a USNA System of Records as specified in the associated System of Records Notice (SORN).
 - c. Per references (c) and (d) cloud storage may be used to store USNA data when explicitly approved by the USNA Configuration Control Board (CCB), and:
 - (1) The cloud storage must be licensed for USNA use.
 - (2) Only USNA data may be stored.
 - (3) A government furnished and configured endpoint device shall be used to access USNA PII.
 - d. USNA Google Workspace Drive and USNA Google Workspace Shared Drive are authorized for storing USNA PII except as proscribed below,
 - (1) Storing the following PII in USNA Google Workspace Drive and USNA Google Workspace Shared Drive is **PROHIBITED** in any quantity:
 - (a) Social Security Number
 - (b) Driver's License Number
 - (c) Financial Account Number

- (d) Passport Number
- (e) Insurance Policy Number
- (f) Fingerprint
- (g) Iris scan

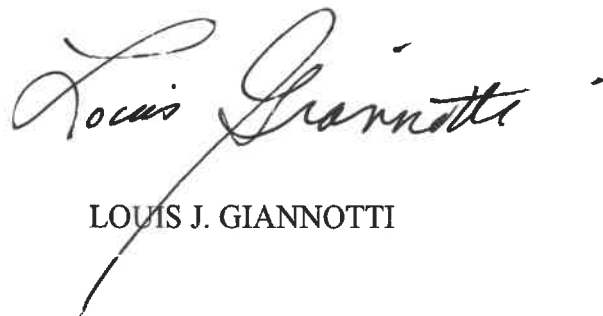
(2) Storing the following PII in USNA Google Workspace Drive and USNA Google Workspace Shared Drive is **PROHIBITED** in any quantity when the data is associated with an individual's name:

- (a) Truncated Social Security Number
- (b) Date of birth
- (c) Citizenship or immigration status
- (d) Ethnic or religious affiliation
- (e) Sexual orientation
- (f) Criminal history
- (g) Medical history, mental condition, medical treatment, medical diagnosis
- (h) Mother's maiden name
- (i) Account password or PIN

(3) To obtain CCB approval to use a cloud service other than USNA Google Workspace to store PII that is not listed above, the data owner is individually responsible for specifying additional access and confidentiality controls that the data owner deems necessary:

- (a) The data owner must consider the factors for determining PII confidentiality impact levels that appear in reference (e).
- (b) The data owner must assert by digital signature that the cloud service provides the specified controls.

e. USNA PII may be stored on the internal physical storage of a device configured to use USNA enterprise-managed full encryption. PII shall not be stored on a removable storage device except as individually authorized by the CCB.



LOUIS J. GIANNOTTI

Distribution: As required