4e. Breaches of Personally Identifiable Information

Subgrantees need to be prepared for potential breaches of Personally Identifiable Information, PII. OMB defines PII as any information about an individual, including but not limited to, education, financial transactions, medical history, and criminal or employment history 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. All subgrantees must ensure that they have procedures in place to prepare for and respond to breaches of PII, and notify the CNCS in the event of a breach.

Subgrantees must establish procedures to prepare for and respond to a potential breach of PII, including notice of breach to Nevada Volunteers and to CNCS. Subgrantees should immediately notify CNCS' Office of Information Technology, your Nevada Volunteers Program Contact, and CNCS' Office of Inspector General. Here is a <u>sample PII Policy</u> for your use.