

AGENDA ITEM FOR ADMINISTRATIVE MEETING

( ) Discussion only  
(X) Action

FROM (DEPT/ DIVISION): Dan Lonai, Administrative Services

PROGRAM: IT

SUBJECT: Personal Identifying Information (PII) Policy

<p>Administrative Services is requesting the approval and the adoption of the attached Personal Identifying Information Policy. This policy is required before the county can qualify for a higher tiered cyber insurance through our property and liability insurance carrier</p>	<p><u>ACTION REQUESTED:</u>  Adopt the Personal Identifying Information policy, Policy No. AS-15.0</p>
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ATTACHMENTS: Proposed Policy

Date:2/14/2024      Submitted By: (Dan Lonai)

\*\*\*\*\*For Internal Use Only\*\*\*\*\*

Checkoffs:

- ( ) Dept. Head (copy)
- ( ) Human Resources (copy)
- ( ) Budget (copy)
- ( ) Fiscal
- ( ) Legal (copy)
- ( ) (Other - List:

To be notified of Meeting:  
Dan Lonai & Riley Wortman

Needed at Meeting:  
)

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Scheduled for meeting on: February 21, 2024

Action taken:

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Follow-up:

# Umatilla County Administrative Service Policies

POLICY #: AS-

EFFECTIVE DATE: February, 2024

DEPARTMENT: Administrative Services Department

TITLE: Personal Identifying Information

## **I. Purpose:**

To ensure Umatilla County use and disclosure of Personal Identifying Information (PII) are limited to the minimum necessary to accomplish the intended purpose.

## **II. Scope:**

This policy applies to all Umatilla County employees, interns, contractors and volunteers.

## **III. Policy Statement:**

It is the policy of Umatilla County to make all reasonable efforts to use or to disclose the minimum amount of PII required to achieve the particular use or disclosure unless an exception applies.

For any non-routine request for disclosure of PII that does not meet an exception, staff will review the request for disclosure on an individual basis.

## **IV. Procedures:**

1. Any type of disclosure or request for disclosure that is added on a routine and recurring basis, will limit the disclosed PII, or the request for disclosure, to that which is reasonably necessary to achieve the purpose of the disclosure or request.
2. Disclosures or requests for disclosure, that are **not** made on a routine and recurring basis (non-routine disclosures), staff will review the request to verify that PII disclosed or requested is the minimum necessary. All requests for non-routine disclosures or requests that do not meet an exception will be reviewed using standard criteria.
3. Exceptions to minimum necessary requirements: Umatilla County will release information without concern for the minimum necessary standard as follows:
  - a. Disclosures to or requests by federal or state agency for tax, retirement and employment purposes.

- b. Uses or disclosures made to the client who is the subject of the PII.
  - c. Uses or disclosures made for the purposes of medical insurance.
4. Umatilla County may use or disclose an individual's PII **only** when such use or disclosure is specifically justified as the amount that is reasonably necessary to accomplish the intended purpose or if one of the exceptions noted above applies.
  5. Umatilla County, upon determination that the use, disclosure or request for PII is the minimum necessary or one of the above exceptions apply, will release the PII to the requestor.