

“Managing Privacy under HSPD-12”

([Eric M. Stout@hud.gov](mailto:Eric_M_Stout@hud.gov))

- Interior’s web training: “Privacy Module”
- HSPD-12 says... “protect personal privacy”
- OMB’s 7 Privacy Requirements
 - OMB Memo [M-05-24](#) and [M-06-06](#)
- Privacy Impact Assessment (PIA)
- What personal info. is on PIV-II Card?
 - Visual + Electronic
- When implementing HSPD-12... remember the 7 Privacy Requirements



Interior's Federal-wide HSPD-12 web training: “Privacy module”

- For all employees and contractors
- For PIV Registrars and Card Issuers
- Answers 5 common questions:
 - What technology innovations on the PIV Card ensure my identity while protecting my privacy?
 - What information about me is on the PIV Card?
 - What background information is collected – and why?
 - How will my personal information be protected, and what controls are in place?
 - Who can I talk to if I have privacy questions or concerns?

HSPD-12 says...

“protect personal privacy”

- “(1) ... it is the policy of the United States to enhance security, increase Government efficiency, reduce identity fraud, and **protect personal privacy** by establishing a mandatory, Government-wide standard for secure and reliable forms of identification....”
- “(6) This directive shall be implemented in a manner consistent with the Constitution and applicable laws, including the **Privacy Act (5 U.S.C. 552a)** and other statutes protecting the rights of Americans.”



OMB's 7 Privacy requirements

(OMB M-05-24 and OMB M-06-06)

- #1: Privacy Act of 1974
- #2: Privacy official to oversee
- #3: Privacy Impact Assessment (PIA)
- #4: Federal Register System of Records Notice
- #5: Use OMB-approved forms (SF-85, 85P, or 86)
- #6: Privacy policies (and privacy statement)
- #7: Adhere to HSPD-12 “control objectives”



Privacy Impact Assessment (PIA)

- Required by E-Government Act of 2002
- Guidelines for PIA in [OMB Memo M-03-22](#)
- Required by [OMB Memo M-05-24](#)
- Sample PIA in [OMB Memo M-06-06](#)
- PIA is required for systems/ databases supporting PIV process
- PIA assesses adequacy of privacy controls:
 - PIV-II Card
 - Identity Management System (IDMS)



What personal information is on the PIV-II Card?

- **Visual features – mandatory:**
 - Photo
 - Full Name
- **Visual features – optional:**
 - Signature
 - Rank
 - Physical characteristics
 - Agency-specific text



What personal information is on the PIV-II Card?

- **Electronic features – mandatory:**
 - 2 Fingerprints (“points” – not full image)
 - User PIN #
 - Card Holder Unique Identifier (“CHUID”)
 - PIV authentication keys
- **Electronic features – optional:**
 - Photo (mandatory as visual feature)
 - PKI digital signature certificate



When implementing HSPD-12, remember the 7 Privacy Requirements “on the ground, day-by-day”

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