

Lesson 6: Working with Sensitive Data

Lesson Overview

In the previous lesson, you learned what it is like to work within a GIU. You learned how to compile data into maps and data products, how to analyze geospatial data to provide answers to diverse questions, how to document data and how to work within tight time constraints.

In this lesson, you will learn how to share, store, and protect the sensitive data you may encounter as part of your work. You will learn about requirements to adhere to copyright, disclaimer, licensing, and other sensitive product and data distribution protocols.

This lesson should take approximately 10 minutes to complete.

Learning Objectives

By the end of this lesson, you will be able to:

- Recognize how to work with sensitive data

Tying It Back to the Job

This lesson aligns with the following Position Task Book (PTB) Behavior/Activity:

- Comply with established policy and protocols

Using Markings and Disclaimers

When working in a GIU, you may sometimes encounter material that includes sensitive or personal information that needs to be protected. This lesson will introduce you to the common disclaimers used at FEMA to avoid the inadvertent disclosure of sensitive information.

Common disclaimers for products generated by the GIU include:

- Privacy Act Disclaimers
- For Official Use Only Disclaimers
- Disclaimers Requiring Coordination and Approval
- Commercial Imagery Markings

Privacy Act Disclaimer

The Privacy Act of 1974 provides protection against unauthorized disclosure of any records (documents, papers, charts, graphics, maps, etc.) which contain a person's name or other Personally-Identifiable Information (PII).

As a GISP, it is important to recognize that all data derived from the Individual Assistance (IA) program is protected under the Privacy Act, specifically when an individual applicant could be identified from the map.

Derived map products that include PII require a disclaimer that contains the following language:

This document may contain information protected under the Privacy Act of 1974, 5 U.S.C. §552a (2000). Neither this document nor the material contained therein may be reproduced, stored in a retrieval system or transmitted in any form or by any means without the prior permission of FEMA.

Protecting Personally Identifiable Information

One way to protect PII is to develop map products at a scale of 1:100,000 or greater. Most map products developed at this scale will not require the disclaimer presented on the previous screen, though this should be verified with the appropriate authorities including the IA Branch Director (IABD), and the Office of Chief Counsel (OCC) representative.

If such a scale is not possible, alternative presentations of the data should be used. This might include, for example creating a product that generalizes IA applicant data using the U.S. National Grid (USNG) at 1 kilometer intervals.

Recognizing Authoritative Data Sources

To preclude unauthorized access and ensure that all documents covered under the Privacy Act are handled appropriately, your manager will:

- Ensure that all PII are properly secured
- Ensure that any and all sensitive materials are destroyed using a cross-cut shredder

Properly Secured

Sensitive materials may be stored electronically as encrypted digital files or password-protected emails; printed copies may be stored in a locked file cabinet.

What is FOUO?

The marking, For Official Use Only (FOUO), is used to identify materials that contain unclassified information of a sensitive nature. While not classified, FOUO materials need to be protected in accordance with appropriate security policy.

FOUO designations require coordination with the data provider and approval through the Planning Section Chief and FCO. All maps, geospatial products, charts, and other graphics that

meet this threshold are prominently marked in the upper right and lower left corners with the following caveat:

- Unclassified // For Official Use Only

For Official Use Only

According to FEMA policy, "FOUO" is a designation that applies to unclassified information of a sensitive nature, not otherwise categorized by statute or regulation. To further meet this definition, the unauthorized disclosure of such information must have the potential to adversely impact a person's privacy or welfare, the conduct of Federal programs, or other programs or operations essential to the national interest.

Products that contain addresses or phone numbers (such as maps, reports with the FCO's phone number, and so on) are all examples of FOUO information.

Protected

FOUO materials require special handling. They should always be covered and marked appropriately. They cannot be shared or left out, and they cannot be downgraded. Unless approval is granted, FOUO materials should stay within the JFO at all times.

Disclaimers Requiring Coordination and Approval

Special issues at the JFO may require the use of other disclaimers included in the standard operating procedures. These are coordinated with your supervisor and program personnel who are involved with the final products. These are approved by the Office of Chief Counsel (OCC) representative. This often involves restrictions on distribution of map products to only authorized parties, or written designation on the geospatial product.

Such a product might include, for example, a disclaimer such as the following:

FOR INTERNAL USE ONLY: This product may be protected by one or more copyrights and license restrictions. Neither this document nor the material contained herein may be reproduced, stored in a retrieval system, or transmitted in any form or by any means without the prior written permission of the FEMA Federal Coordinating Officer.

Working with Commercial Imagery

As a GISP, you will also work with commercial imagery, most of which is licensed or copyrighted. When working with commercial imagery, you must convey the data license terms and conditions as appropriate.

Data License Information

It is also recommended that data license information be included when sharing/distributing image products. The format for marking products should adhere to the following template:

© 2007 "Vendor's Name"

Licensed under "Contract Name"

Note: If the copyright material is only part of the work, the notice should read: "Contains data © 2007 "Vendor's Name". For display purposes (such as when creating PowerPoint® slides, posters, etc.), you must maintain the "Copyright: © 2007 "Vendor's Name" marking.

Releasing Information to the Public

FEMA is making more and more information available to the public, not only through traditional news media, but through emergent social media platforms as well. This is also true for geospatial data and products.

Before releasing any geospatial products to the public, be sure the products have been approved for release by your supervisor.

Lesson Summary

This lesson presented the following topics:

- Recognize how to work with sensitive data

The next lesson explains how to use remote sensing products.