

Illinois State Board of Education
Federal and State Monitoring Division

Checklist for Protection of Personally Identifiable Information Review

Guidance

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200 – Federal Uniform Guidance) provides the following guidance and requirements on Personally Identifiable Information (PII). This is not an exhaustive list and is meant to help guide and prepare grantees for the testing that will occur during a field or desk monitoring engagement.

§200.79 Personally Identifiable Information (PII).

PII means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, public Web sites, and university listings. This type of information is considered to be Public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.

§200.82 Protected Personally Identifiable Information (Protected PII).

Protected PII means an individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal, medical and financial records, educational transcripts. This does not include PII that is required by law to be disclosed. (See also §200.79 Personally Identifiable Information (PII)).

Requirements and Checklist

Requirements	Policy and Procedure Support
The LEA must take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality. 2 CFR 200.303(e)	Evidence shall include but not be limited to: <ol style="list-style-type: none">1. Approved policy or policies related to the identification, handling, storage, access, disposal and overall protection of PII.2. Documentation of training of all employees/contractors on the approved policy including evidence of the date(s) of the training, attendance/completion of the training, content of the training, and any other relevant information. Training must be provided to any other parties who have access to such information.3. Documentation that the approved policy is being followed.

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Other relevant citations:

[Family Educational Rights and Privacy Act \(34 CFR 99\)](#)

[Identity Protection Act \(5 ILCS 179\)](#)

[Personal Information Protection Act \(815 ILCS 530\)](#)

[Illinois School Student Records Act \(105 ILCS 10\)](#)