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Bulletin #23-10

SUBJECT: Sensitive Information on Documents Stored in DocuWare

- DATE: May 10, 2023
 - TO: All State Agencies

FROM: Douglas E. Cotnoir, CPA, CIA, State Controller

The purpose of this bulletin is to communicate guidance for Personal Identifiable Information (PII), confidential and sensitive information contained in documents that are scanned into DocuWare, including: contracts, payments, journals, and cash receipts

General Overview

Data stored in DocuWare is encrypted both at rest and in-flight, and OSC restricts access to DocuWare through user-level security.

Agency Responsibilities

Agencies are responsible to determine what is considered PII, confidential or sensitive information on documentation that is scanned into DocuWare and to ensure that such information is protected as required by its security classification. Agencies must implement the appropriate policies, procedures, and business practices to ensure the proper protection, authenticity, reliability, integrity, and usability of records, especially those that contain PII, confidential or sensitive information.

The Office of the State Controller recommends that agencies redact PII, confidential and sensitive information from supporting documentation except for vendor-related VCC and VCM documents (i.e., substitute Form W-9). VCC and VCM document access is limited to the Office of the State Controller personnel who require PII for vendor verification, but all other documents should remove or mask PII, confidential and sensitive information to maintain confidentiality. If PII, confidential or sensitive information is necessary to maintain, unredacted copies should be housed onsite at the Agency in a secure area.

The Department of the Secretary of State, Maine State Archives also provides guidance regarding records retention and protecting confidential information at <u>https://www.maine.gov/sos/arc/records/</u>.

For more information on what is considered PII, please refer to MaineIT's Information Security Policy found at <u>https://www.maine.gov/oit/sites/maine.gov.oit/files/inline-files/SecurityPolicy.pdf</u>.

If your agency has questions pertaining to this guidance, please contact the Office of the State Controller at <u>https://www.maine.gov/osc/contact-us</u>.

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