

Procedures/Standards Update

PS005_2019

November 2019

TO:

Chief Information Officers (CIO)
Information Security Officers (ISO)
Agency Chief Information Officers (AIO)
Agency Information Security Officers (AISO)

SUBJECT:

Privacy Threshold Assessment and Privacy
Impact Assessment

BACKGROUND

The California Department of Technology (CDT) Office of Information Security (OIS) has developed the Privacy Threshold Assessment and Privacy Impact Assessment Standard (SIMM 5310-C) to establish privacy protection requirements to further support Agency/state entity compliance with existing statewide privacy requirement. The Information Security Program Management Standard, Statewide Information Management Manual (SIMM) 5305-A, requires Agency/state entity Privacy Program Officers/Program Coordinators to assist program management with conducting privacy impact assessments. Effective immediately, all Agencies/state entities must ensure that Privacy Assessments for their respective organization(s) comply with the standards outlined in SIMM Section 5310-C.

PURPOSE

The purpose of this Procedures/Standards update is to announce:

- New SAM Section 5310.8, Privacy Threshold and Privacy Impact Assessment, to highlight the importance of conducting Privacy Impact Assessments (PIAs) for safeguarding the privacy rights of individuals by conducting a Privacy Threshold Assessment (PTA) on all new and modified information systems, and a PIA when the collection, use, maintenance or disclosure of personal information, as defined by Civil Code section 1798.3, is involved.
- Updated SAM Section 5315.1 to include reference to privacy requirements during system and services acquisition.
- Updated SAM Section 5315.2 to include reference to additional privacy considerations, including those in SIMM Section 5310-C, throughout the system development lifecycle.
- New SIMM Section 5310-C, Privacy Threshold Assessment and Privacy Impact Assessment Standard, which includes a PTA and PIA template tool.

REFERENCES

The following reference materials are associated with this procedures/standards update. SIMM is available on the Department of Technology's website located at: <https://cdt.ca.gov/policy/simm/>. The State Administrative Manual (SAM) is available on the Department of General Services website located at: <http://sam.dgs.ca.gov/>.

- SAM Section 5310
- SAM Section 5310.8
- SAM Section 5315.1
- SAM Section 5315.2
- SIMM Section 5310-C

QUESTIONS

Questions regarding this announcement should be directed to the Department of Technology, Office of Information Security at security@state.ca.gov.