



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, DC 20224

March 29, 2012

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MEMORANDUM FOR DISTRIBUTION

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SUBJECT: Interim Guidance on IRS Agency-Wide Shipping Policy and Procedures  
for Personally Identifiable Information (PII)

**Purpose**

The purpose of this memorandum is to issue interim guidance procedures for employees to follow when shipping hardcopy documents containing personally identifiable information (PII) until IRM 10.2.13 is published. These procedures are designed to help ensure packages containing PII are delivered to the intended recipient by providing instructions on how to properly package and track these types of shipments. Please ensure that this information is distributed to all affected employees within your organization.

**Background**

In May 2008, the Office of Privacy, Information Protection and Data Security (PIPDS) initiated a series of "Identity Theft Risk Assessments and Process Evaluations" on IRS shipping processes because of concerns raised by the number of incidents involving lost shipments of hardcopy PII from IRS locations. Shipping incidents account for a significant number of PII data losses each year that require notification to individuals.

The findings and recommendations generated from these risk assessments were reviewed in detail by IRS management. The assessments served as the basis for the IRS' development of uniform procedures and recommendations for improving the four key processes associated with shipping PII in a safer and more secure manner. These four key processes include packaging, labeling, shipping, and tracking.

This memorandum provides updated procedural requirements designed to improve the internal shipping process by ensuring these recommendations are effectively implemented. These guidelines were previously issued as recommended procedures and are now being made mandatory. A Memorandum of Understanding (MOU) with the National Treasury Employees Union (NTEU) was signed by the IRS on February 14, 2012 and by NTEU on February 24, 2012. Under the terms of the MOU, training on the new procedures will be provided through an all employee toolkit. Managers must ensure that they provide this mandatory training to all employees who ship PII prior to July 1, 2012.

### **Types of Shipments Impacted**

The sender must first determine if the package contents contain PII. PII refers to information which, either by itself or combined with other pieces of information, can be used to distinguish or trace an individual's identity. This includes, but is not limited to, an individual's name, social security number, biometric records (height, weight, eye color, fingerprints, etc.), place of birth, address, etc.

If the package contains PII, the sender will then follow the required procedures for properly packaging, labeling, and tracking the shipment. These procedures apply when shipping PII by a carrier other than the United States Postal Service (USPS). Mail to taxpayers should continue to be sent via USPS and does not require double packaging and/or double labeling or the use of Form 3210 for tracking purposes.

### **Procedural Change**

See the attached guidance for the appropriate procedures to follow when shipping PII through a carrier other than the United States Postal Service. The attachment includes the IRM guidance on the following recommendations that are being implemented:

- Double-Package and Double-Label Packages Containing PII
- Use Undamaged Packaging Materials
- Securely Package PII Contents Prior to Shipping
- Prohibit Use of Sensitive Contents Labels on PII Packages
- Set Timelines for Form 3210, Document Transmittal, Acknowledgement Follow-Up
- Audit Form 3210 Acknowledgement Process
- Use of CampusShip (mandatory at all locations except Campus locations and offices serviced by an AWSS contract mailroom)

### **Effect on Other Documents**

These procedures will be incorporated into Internal Revenue Manual (IRM) 10.2.13, "Information Protection" within one year of the date of this memorandum. Additional information about shipping PII can be found on the IRS intranet at <http://publish.no.irs.gov/mailtran/PIIHardcopy.html>.

### **Effective Date**

These procedures will become effective July 1, 2012.

**Contact Information**

If you have questions about this memorandum, please contact Mark Zuverink, Chief, Postal and Transport Policy, or Kevin Pinkney, Associate Director, Incident Management.

**Attachment**Distribution

Chief of Staff, Office of the Commissioner  
Deputy Commissioner for Operations Support  
Deputy Commissioner for Services and Enforcement  
Commissioner, Large Business and International Division  
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Chief Information Officer  
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Director, Research, Analysis & Statistics  
National Taxpayer Advocate

cc: Office of Servicewide Policy, Directives & Electronic Research  
[www.irs.gov](http://www.irs.gov)

The following changes are hereby effective July 1, 2012 for IRM 10.2.13.

#### 10.2.13.4.4.1

(MM-DD-YYYY)

#### Shipping Personally Identifiable Information

(1) If the package contains PII (see IRM 10.2.13.3.1) and is being shipped through a private delivery carrier, the sender will follow the procedures included below for properly double packaging, double labeling, and tracking the shipment, including the use of Form 3210, Document Transmittal.

Exception: Double packaging, double labeling, and the use of Form 3210 are not required when mailing via the United States Postal Service (USPS). Mail to taxpayers and mail to Post Office Boxes must continue to be sent via USPS. Packages containing PII that weigh less than 13 ounces may also be mailed via USPS.

(2) When shipping PII, the use of UPS CampusShip is mandatory at all locations except Campus locations and offices serviced by an AWSS contract mailroom. UPS CampusShip is an internet-based shipping system that can be accessed from any location that has internet access. UPS CampusShip has been rolled out across the country to IRS field offices that are not serviced by an AWSS contract mail room. Training material can be found in the following UPS CampusShip documents:

- Document 12888, UPS CampusShip: Electronic Shipping Methods
- Document 12889, UPS CampusShip: Advanced Features

(3) CampusShip allows employees to:

- Generate labels electronically.
- Secure current IRS address information from corporate address repository to improve accuracy of delivery. CampusShip features a Corporate Address Book which contains addresses for over 700 IRS locations; this improves accuracy of delivery since addresses are current.
- Track packages via the internet to easily verify their shipments arrived at the intended destination and to quickly identify a missing shipment, reducing the likelihood that PII could be lost or exposed to an unauthorized individual.

(4) Packages containing PII must be double-packaged and double-labeled prior to shipping. Double-packaging helps ensure the contents are protected if the outer package is damaged or destroyed during the shipping process. Duplicate shipping labels will allow the contents to be properly delivered without potential disclosure if the external package is damaged or destroyed.

**Caution:** Shrink wrapping the external packaging or wrapping the external packaging in paper does not satisfy double packaging requirements.

(5) Employees shall evaluate the size of the PII shipment to be sent and identify appropriate packing materials. The appropriate type of internal and external packaging depends upon the size and weight of the package to be shipped. Use the smallest size packaging possible to reduce shipping costs and ensure minimal shifting of contents during shipment.

(6) The sender must also determine whether to ship via ground service or express (Overnight and Second Day Air) services:

- **Ground service** should be used for shipping whenever possible. Ground service should always be the first choice; use express services only when absolutely necessary. There is no requirement that PII must be mailed via express services. For distances up to 500 miles, the regular ground service offered by the small package or motor freight carriers (depending on weight of shipment) can deliver your shipment within one or two days. For ground shipments, the business operating divisions provide the packaging material.
- **Express Services** are generally the fastest mode of transportation available, but are also much more expensive. This mode should only be used when transit time requirements are very short and the urgency of the shipment outweighs the additional costs involved; for example, remittances, statute cases, tax court cases, etc. Small package carrier provided packaging (carrier branded envelopes and boxes) can only be used for express services and are provided at no cost.

(7) The sender will prepare Form 3210, Document Transmittal, identifying the package contents for all packages containing PII. For easier tracking, the sender may include the small package carrier tracking number in the "Remarks" area of Form 3210 on Part 4 (sender's copy).

- If the sender is using the small package carrier's web-based system to electronically generate shipping labels, the tracking number is immediately available on the pre-printed UPS label.
- If the sender is using a contract mailroom, the sender should complete the sender's e-mail address section of Form 9814, Request for Mail/Shipping Service. The mailroom will enter this e-mail address when preparing the shipping label and the small package carrier will send an e-mail to the sender providing the tracking number. The sender can then place the tracking number on Part 4 of Form 3210 for proper record keeping.

**Caution:** According to current instructions, Social Security numbers appearing on Forms 3210 should be redacted to show only the last four digits. Do not include the full SSN on Form 3210.

(8) Securely package the PII by placing the contents and the properly completed Form 3210 in an appropriately sized internal package. The sender will retain Part 4, Sender's copy, of Form 3210 and will include Part 1, Recipient's copy, and Part 3, Acknowledgement copy, with the shipment. When possible, when sending the package to a specific individual, the sender may choose to notify the recipient via e-mail, phone, or other method prior to shipment that the package containing PII is being sent. The sender may also choose to send an electronic PDF version of Form 3210 via secure e-mail to the intended recipient so the recipient is aware of the expected shipment.

(9) Internal packaging may include any of the following:

- **An envelope:** an E-20, Confidential Information envelope, is acceptable for this purpose.
- **A plastic bag:** should be sturdy enough to support the weight of the contents without tearing; should be black, green, or a similar color so the contents are not readable through the plastic bag.  
NOTE: This is recommended as the easiest and most cost effective method for double packaging large case file shipments.
- **A small box:** an undamaged smaller box that fits within the external shipping box.

(10) Label the internal package with the following information:

- Send To Address, including Mail Stop and/or Drop Point Number, if applicable
- Return Address, including Mail Stop and/or Drop Point Number, if applicable
- Sender's phone number
- Small Carrier tracking number, if available

(11) The sender may use a copy of the exterior small package carrier shipping label for the internal label.

- If using a small package carrier web based shipping system to label packages, print two copies of the generated label and attach one to the internal package.
- If using a hardcopy small package carrier shipping document to label packages, make a photo-copy of the original form and attach it to the internal package.
- If using Form 9814, prepare an internal label with the required information. A copy of Form 9814 can also be included with the internal label.

(12) Place the properly labeled, packaged, and sealed internal package into the external package. External packaging materials may include:

- **Envelope;** For shipping smaller case files and documents via ground service, use an IRS issued non-confidential envelope (E-44; minimum size 9 ½ X 12). Use an envelope or padded pack provided by the Small Package Carrier only when time constraints require shipping via express services.
- **Box:** Use an undamaged box specifically designed for shipping. Choose a box strength that is suitable for the size and weight of the contents you are shipping. For shipping smaller packages up to 10 pounds, use a small box ordered from an office supply vendor for ground shipments. Use boxes provided free of charge by the small package carrier only when time constraints require shipping via express services. For shipments over 10 pounds, the external box should be a suitable flap top, corrugated cardboard box rated with a bursting strength to support the contents. Never exceed the maximum gross weight for the box, which is usually printed on the box maker's certificate on the bottom flap of the box.

Note: A standard Shipping Record Box (size 14.75" X 12" X 9.5") that is used to retire files meets this requirement. If possible, use the Shipping Record Box Sleeve as the external packaging. File boxes used for Federal Record Center storage, combined with a sleeve box, will have a bursting strength exceeding 125 pounds per square inch and will be more than adequate for most ground shipments.

**Caution:** Used copy paper boxes and other boxes with lids do not meet this requirement; boxes with lids can get caught on conveyer belts and damage or destroy the shipment.

(13) Whenever possible, use a new box; however undamaged packaging materials may be re-used to ship PII. Only reuse a box if it is in good condition with no punctures, tears, rips or corner damages and all flaps are intact. Remove any existing labels and all other shipment markings if a box is being reused.

(14) If appropriately sized packaging is not available, use cushioning material inside the package so the contents do not move or shift when the package is shaken. Cushioning material should consist of materials that are readily available and they can be re-used. It is not necessary to purchase prefabricated materials specifically designed to cushion packages for this purpose. Examples of cushioning material include non-confidential paper, shredded administrative paper, obsolete forms, newspaper, and/or commercially-purchased Styrofoam peanuts, air bags, etc. Place the cushioning material around the items in the box. Close and shake the box to see whether you have enough cushioning material; add more cushioning material if you hear or feel the contents shifting.

(15) External packaging material shall not be marked or labeled with information indicating that package contents include sensitive information. Packages can still be marked as "time sensitive" or "process immediately" as applicable to ensure documents are processed timely. Labels that indicate sensitive contents include, but are not limited to:

- "Remittance" labels indicating package contents contain remittances; an acceptable alternative method would be to mark the letters W/R (with remittance) and a large red X on the box.
- Labels indicating package contents contain case files or re-files; an acceptable alternative method would be to indicate "Sort and Sequence".

NOTE: Do not remove references to IRS from an envelope since it is necessary to include IRS on Return Address and Send To Address labels to ensure that the package is delivered to the intended location if any of the address information is incorrect.

(16) Seal the package with strong clear shipping tape that is two inches or more in width. Do not use string, paper over-wrap, shrink wrap and/or plastic straps.

(17) Place the shipping label on the top of the package and ensure it is properly adhered and will not separate from the box. Do not place the label over a seam or closure or on top of sealing tape since this could cause it to be damaged or removed from the package.

(18) The sender shall be responsible for monitoring the delivery of the shipment. Employees should follow their organization's established timeframes for Form 3210 acknowledgement follow-up. Where there is no established timeframe in an individual organization, the follow-up action should take place in three business days for overnight shipments and ten business days for ground shipments.

(19) Once the shipment is received, the recipient will verify the contents were received and sign the acknowledgment copy of the Form 3210. The recipient will return the Form 3210 acknowledgement to the sender using secure e-mail (electronic or scanned copy), fax, or mail. If the SSN was not redacted as required on the Form 3210, redact all but the last four digits of the SSN prior to returning it to the sender. After receiving the acknowledgment copy, the sender will associate it with the original Form 3210.

NOTE: No further action is required if the Form 3210 acknowledgment is received.

(20) If the 3210 acknowledgement isn't received within the established timeframe, the sender should access the small package carrier's website to track the shipment to determine if it was delivered successfully. The tracking number should have been included on Form 3210 when the shipping labels were prepared or after the number was received from the carrier if Form 9814 was used.

(21) If the tracking information indicates the package **was delivered**, the sender must call the intended recipient to confirm actual receipt of the package.

- If the recipient did receive the package, ask the recipient to complete and return the Form 3210 Acknowledgement.
- If the recipient didn't receive the package, the package is considered lost within the IRS facility and the sender must follow the procedures for reporting a loss of hardcopy documents. The intended recipient should also initiate a search in their IRS facility when the carrier shows an individual signed for the package.

(22) If the tracking information indicates the package **was not successfully delivered**, the sender should closely monitor the tracking information for up to 48 hours (2 business days) after the anticipated delivery date for air services and up to 72 hours (3 business days) after the anticipated delivery date for ground services. If the package is not delivered within these timeframes, the package is considered lost and the sender should follow the procedures for reporting a loss of hardcopy documents.

(23) Within one hour of identifying a package is lost; report the loss to:

- Your Manager
- Appropriate Incident Reporting Office:
  - If the package contained only hardcopy documents, report to **Situation Awareness Management Center (SAMC)**
    - Complete security incident reporting form at <https://www.csirc.web.irs.gov/physical> or
    - Call 1-866-216-4809
  - If the package also contained an IT asset (e.g. removable media, CD/DVD, flash drive, etc.) in addition to the hardcopy documents, report instead to **Computer Security Incident Response Center (CSIRC)**
    - Complete security incident reporting form at: <https://www.csirc.web.irs.gov/incident/> or
    - Call 1-866-216-4809
- Treasury Inspector General for Tax Administration (TIGTA)
  - 1-800-366-4484

(24) Managers shall perform, at a minimum, quarterly audits of the Form 3210 Acknowledgement process for packages containing PII to ensure appropriate follow-up is occurring. This procedure will allow IRS managers the opportunity to validate that PII senders are following up on Form 3210 Acknowledgments within defined timeframes so that lost shipments are identified quickly. This reduces the likelihood that the PII could be exposed to an unauthorized user. Local management should determine the proper follow-up timeframe as part of the manager's operational review. Forms 3210 should be maintained in accordance with the existing record retention schedule for each Business Unit.