United States Department of State
and the Broadcasting Board of Governors
Office of Inspector General

Office of Audits

Review of Controls and Notification for Access to Passport Records in the Department of State's Passport Information Electronic Records System (PIERS)

AUD/IP-08-29

July 2008

~~Important Notice~~

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Table of Contents

Executive Summary

In March 2008, media reports surfaced that the passport files maintained by the Department of State (Department) of three U.S. Senators, who were also presidential candidates, had been improperly accessed by Department employees and contract staff. On March 21, 2008, following the first reported breach and at the direction of the Acting Inspector General, the Office of Inspector General (OIG), Office of Audits, initiated this limited review of Bureau of Consular Affairs (CA) controls over access to passport records in the Department's Passport Information Electronic Records System (PIERS). Specifically, this review focused on determining whether the Department (1) adequately protects passport records and data contained in PIERS from unauthorized access and (2) responds effectively when incidents of unauthorized access occur.

As of April 2008, PIERS contained records on about 192 million passports for about 127 million passport holders. These records include personally identifiable information (PII), such as the applicant's name, gender, social security number, date and place of birth, and passport number. PIERS offers users the ability to query information pertaining to passports and vital records, as well as to request original copies of the associated documents. As a result, PIERS records are protected from release by the Privacy Act of 1974.[1] Unauthorized access to PIERS records may also constitute a violation of the Computer Fraud and Abuse Act (18 U.S.C. § 1030).

According to CA officials, there were about 20,500 users with active PIERS accounts as of May 2008, and about 12,200 of these users were employees or contractors of the Department. PIERS is also accessed by users at other federal departments and agencies to assist in conducting investigations, security assessments, and analyses.

OIG found many control weaknesses—including a general lack of policies, procedures, guidance, and training—relating to the prevention and detection of unauthorized access to passport and applicant information and the subsequent response and disciplinary processes when a potential unauthorized access is substantiated. In some cases, Department officials stated that the lack of resources contributed to the lack of controls and to the Department's ability to assess vulnerabilities and risk. OIG has made 22 recommendations to address the control weaknesses found.

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[1] With certain exceptions, the Privacy Act prohibits an agency's release of information in an individual's records that includes, but is not limited to, information on an individual's education; financial transactions; medical, criminal, or employment history; and name or identifying number (i.e., Social Security number).

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Management Comments and OIG Response

OIG received comments to a draft of this report from Department officials with the Bureaus of CA, A, Human Resources (HR), and Information Resource Management (IRM) and from the Foreign Service Institute (FSI). (See Appendices G through K, respectively, for the written response from each organization.) All comments received were considered, and where appropriate, OIG has revised the report and recommendations to clarify the information presented.

Of the 22 recommendations made by OIG, the Department generally agreed with 19, partially agreed with 1, and did not concur with 2. Based on the responses, OIG considers 19 recommendations resolved and three recommendations unresolved. To ensure that adequate and timely progress is achieved, OIG will conduct a follow-up compliance review of the Department's implementation of the recommendations in this report, as well as CA's process for reviewing possible unauthorized accesses by users as identified in OIG's study (see Appendix A).

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Background

Congress established the Department of State (Department) as the sole authority to issue passports to U.S. citizens,[4] and the Bureau of Consular Affairs (CA) is tasked with this responsibility. Through 18 passport agencies across the United States, CA processes domestic passport applications; prints passport books; and provides information and services to U.S. citizens on how to obtain, replace, or change a passport. CA also supports the issuance of passports through embassies and consulates abroad. During FY 2007, the Department issued almost 18.4 million passports domestically and participated or assisted in the issuance of about 365,000 passports overseas.

A U.S. passport is the official U.S. government document that certifies the holder's identity and citizenship and permits travel abroad. Applications for passports require the submission of personally identifiable information (PII),[5] such as the applicant's date and place of birth and social security number. In addition, other documentation, such as the applicant's birth or naturalization certificate, is required. The Department is responsible for maintaining the integrity of U.S. passport operations and for safeguarding the PII obtained for each passport application. PII is protected by the Privacy Act of 1974 and by other applicable regulations and guidance, such as those found in Office of Management and Budget (OMB) memoranda, Presidential Directives, and the Department's Foreign Affairs Manual (FAM). Applicable laws, directives, and guidance are summarized in Appendix F.

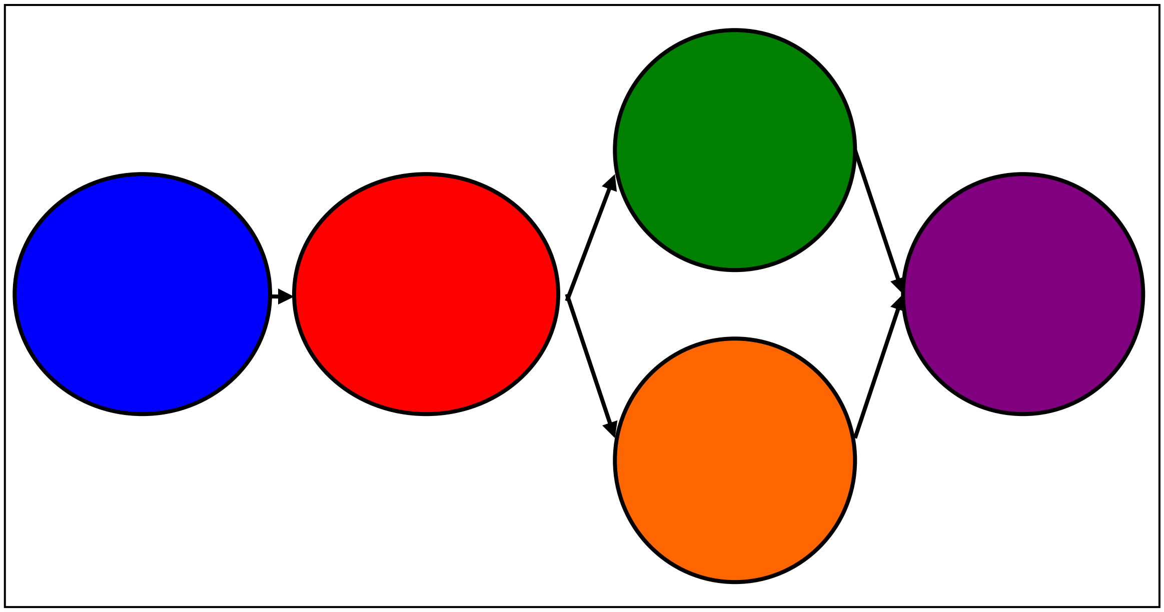
CA uses various systems for data entry, scanning, issuing, archiving, and querying documentation for the passport operations. These systems include the Travel Document Issuance System (TDIS), the Passport Records Imaging System Management (PRISM) database, the Passport Lookout Tracking System (PLOTS), the Management Information System (MIS), the Consular Lost and Stolen Passport (CLASP) system, and the Passport Information Electronic Records System (PIERS). The passport systems also interact with other CA systems, as well as with systems of other federal agencies and private entities (see Appendix B). However, the primary system or tool that CA uses for querying archived passport records is PIERS.[6] CA is responsible for the data integrity, security, privacy, and accountability of the passport and/or consular records maintained in all passport systems, including PIERS. The interrelation of various passport systems is shown in Figure 1.

[4] 22 U.S.C. § 211a.

[5] The term "personally identifiable information," as defined by the Office of Management and Budget, refers to information that can be used to distinguish or trace an individual's identity, such as name, social security number, or biometric records, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual, such as date and place of birth and mother's maiden name.

[6] Other tools, such as TDIS, are used to query in-process records.

Figure 1. Passport Data Input and Retrieval Process



Source: Bureau of Consular Affairs, Computer Systems and Technology (CA/CST)

Legend: TDIS: Travel Document Issuance System
PRISM: Passport Records Imaging System Management database
PIERS: Passport Information Electronics Records System

CA implemented the PIERS software application in April 1999 to improve user response time and create greater capacity and connectivity with researching passport records. PIERS offers users the ability to query information pertaining to passports and vital records, as well as to request original copies of the associated documents. Through PIERS, authorized users can view scanned images of passport applications and select supporting documentation (b) (2)
(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2) for records created from 1994 to the present. In addition, PIERS contains passport applicant information, but no scanned images, for records created from about 1978 to 1993. An applicant's archived passport records are searchable in PIERS.[7] PIERS may be accessed by other Department users, such as CA's Overseas Citizens Services in Washington and American Citizens Services at posts worldwide, to review an individual's data for purposes such as verifying identity when a passport is lost or stolen, identifying and alerting family members when an American citizen is the victim of a disaster or dies abroad, and investigating allegations of one spouse's abduction and transport of a child outside of the United States. Users at other agencies may need access to PIERS for law enforcement and anti-terrorism purposes, such as for verifying the identity of a passport holder at a border crossing.

As of April 2008, PIERS contained records on about 192 million passports for about 127 million passport holders. Passport information is retained for the initial, renewal, and replacement passport of an applicant. These records include PII, such as the applicant's name,

[7] Passport records are available in PIERS within 24 hours of issuance. Images are available once PRISM processing is completed, depending on the agency's schedule. Overseas issuances can take 30 or more additional days.

gender, social security number, date and place of birth, and passport number. PIERS also contains additional information, such as previous names used by the applicant, citizenship status of the applicant's parents or spouse, and scanned images of passport photos, and select supporting documentation, if applicable, submitted by the applicant. As a result, PIERS records are protected from release by the Privacy Act of 1974. Unauthorized access to PIERS records may also constitute a violation of the Computer Fraud and Abuse Act (18 U.S.C. § 1030). Under these provisions, PIERS records should be protected against any unauthorized access that could result in harm, embarrassment, or unfairness to any individual on whom information is maintained.

According to CA officials, there were about 20,500 users with active PIERS accounts as of May 2008, and about 12,200 of these users were employees or contractors of the Department. PIERS is also accessed by users at other federal agencies to assist in conducting investigations, security assessments, and analyses. These other federal entities are located across the United States and include the Department of Homeland Security (DHS), the Federal Bureau of Investigation (FBI), and the Office of Personnel Management (OPM).

According to CA officials, almost all PIERS users have "read only" access.[8] To obtain authorized access to PIERS, a user must submit a request to the certifying authority approved by CA for that organization. The certifying authority approves the request and identifies the appropriate user profile. Select users within CA can access PIERS directly, and other Department and non-Department users with an approved account for the Consular Consolidated Database (CCD) (see Appendix B) can access PIERS on-line via a web portal.

Objectives, Scope, and Methodology

In March 2008, media reports surfaced that the passport files maintained by the Department of three U.S. Senators, who were also presidential candidates, had been improperly accessed by Department employees and contract staff. On March 21, 2008, following the first reported breach and at the direction of the Acting Inspector General, the Office of Inspector General's (OIG) Office of Audits initiated this limited review of CA's controls over access to passport records in PIERS. Specifically, this review focused on determining whether the Department (1) adequately protects passport records and data contained in PIERS from unauthorized access and (2) responds effectively when incidents of unauthorized access occur.

To make these determinations, OIG focused on PIERS, the system in which these improper accesses had occurred. For this review, OIG identified indications of weaknesses in PIERS access controls and responses to unauthorized accesses through interviews with appropriate Department officials, demonstrations, and hands-on use of PIERS and through reviews of relevant policies, procedures, and other supporting documentation. Although cognizant of the Working Group to Mitigate Vulnerabilities to Unauthorized Access to Passport Data, formed by the Department in March 2008 in response to the publicized unauthorized access incidents, OIG did not evaluate or verify the Working Group's ongoing initiatives to identify and address vulnerabilities associated with these breaches. Those initiatives are in

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Appendix C, and the relevant laws, regulations, and guidance reviewed by OIG are listed in Appendix F.

OIG performed work at Department offices in Washington, DC, and Arlington, VA, from March 24 to May 2, 2008. This work included a walkthrough of the Washington, DC, Passport Agency and systems demonstrations of data access and extraction as appropriate. The review included interviews with and/or documents provided by officials from:

- The Bureau of Consular Affairs (CA)
    - Human Resources Division (CA/HRD)
    - Computer Systems and Technology (CA/CST)
    - CA's Directorate of Passport Services (CA/PPT)
    - CA/PPT's Office of Field Operations (CA/PPT/FO)
    - CA/PPT's Washington Passport Agency (CA/PPT/WN)
    - CA/PPT's Office of Passport Integrity and Internal Controls Program (CA/PPT/IIC)
    - CA/PPT's Office of Legal Affairs and Law Enforcement Liaison (CA/PPT/L)
    - CA/PPT's Senior Passport Operations Manager (CA/PPT/POD)
    - CA/PPT's Office of Planning and Program Support (CA/PPT/PPS)
    - CA/PPT's Office of Technical Operations (CA/PPT/TO)
- Bureau of Administration (A), including the Office of Information Programs and Services (A/ISS/ISP)
- Bureau of Information Resource Management (IRM), under the Chief Information Officer
- Bureau of Diplomatic Security (DS)
- Foreign Service Institute (FSI)

OIG also interviewed or received information from representatives from the U.S. Treasury Inspector General for Tax Administration (TIGTA), the Internal Revenue Service (IRS), and relevant operational units and the OIG of the Social Security Administration (SSA). These agencies have addressed similar concerns with the protection of PII in their programs and systems.

To perform limited testing to determine whether indications of unauthorized accesses may exist, OIG judgmentally developed, through a study approach (details and results of this study are in Appendix A), a listing of 150 high-profile names and, with CA's assistance, determined whether the records of these individuals had been accessed and, if so, by whom and how often. However, OIG did not determine whether the results of the study represented authorized or unauthorized accesses during this review. Where the results indicated the potential that an unauthorized access may have occurred because of a high volume of user accesses to the passport records of high-profile individuals, those results were provided to OIG's Office of Investigations for further review. To ensure that adequate and timely progress is achieved, OIG will conduct a follow-up compliance review of the Department's implementation of the recommendations in this report, as well as CA's process for reviewing possible unauthorized accesses by users as identified in OIG's study (see Appendix A).

This limited review was performed as a non-audit service. As such, the scope of the work performed does not constitute an audit under generally accepted government auditing standards.

On June 5, 2008, OIG provided copies of the draft of this report for comment to CA, A, HR, FSI, and IRM and met with CA officials on June 9 and 12, 2008, to discuss the findings and recommendations. The Department officials provided comments and updated OIG on the actions they planned to take to improve controls over PII in PIERS. (See Appendices G through K, respectively, for the written response from each organization.)

Results

OIG found many control weaknesses—including a general lack of policies, procedures, guidance, and training—relating to the prevention and detection of unauthorized access to passport and applicant information and the subsequent response and disciplinary processes when a potential unauthorized access is substantiated. In some cases, Department officials stated that the lack of resources contributed to the lack of controls and to the Department's ability to assess vulnerabilities and risk. OIG has made 22 recommendations to address the control weaknesses identified in this report.

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[13] The students are primarily Department and other federal agency Civil Service, Foreign Service, or contract employees taking formal training as approved by their agencies and provided by FSI.

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Controls Implemented at Other Agencies Offer Examples of Good Business Practices

OIG met with and/or received information from representatives from TIGTA, IRS, and SSA—organizations also responsible for protecting large amounts of electronic PII data—to discuss their controls and found that they had established more controls to prevent and detect unauthorized access than had the Department, as well as penalties for violators. (b) (2)
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The agency representatives stated that their proactive efforts help them in prosecuting users who have improperly accessed records in their systems. For example, at IRS, one measure is that an unauthorized access alert is triggered when a user accesses the taxpayer records of a relative or a neighbor. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2) OIG believes that the collection of these controls offers examples of good business practices that CA should consider for aggressively monitoring user access to PIERS.

> **Recommendation 8:** OIG recommends that the Bureau of Consular Affairs consider the types of controls that the Treasury Inspector General for Tax Administration, the Internal Revenue Service, and the Social Security Administration have put in place to protect electronic personally identifiable information and develop and implement a comprehensive and coordinated strategy for proactively preventing and detecting incidents of unauthorized access to PIERS.
>
> In its response, CA agreed with the recommendation, stating:
>
> The Working Group that CA convened in March 2008 met with representatives from the Internal Revenue Service, the Social Security Administration, and the

> Department of Veterans Affairs in April to ascertain their best practices and lessons learned related to unauthorized access of PII, their auditing systems, and reporting procedures. All three entities provided valuable information that CA is using in developing long range initiatives for monitoring, auditing, and reporting incidents of unauthorized access.

On the basis of CA's response, OIG considers this recommendation resolved. This recommendation can be closed when OIG receives evidence that CA has developed and implemented a comprehensive and coordinated strategy for proactively preventing and detecting incidents of unauthorized access to PIERS.

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No Guidance Available to Consistently Apply Disciplinary Actions

There is no guidance that details the disciplinary actions that should be taken against a user who inappropriately accesses passport records, regardless of whether the user is an employee or a contractor with CA or is external to CA or the Department. Disciplinary actions taken in CA have been left to the discretion of the supervisor and, as such, were inconsistently applied. According to CA officials, the same act of misconduct could affect CA users in different ways; (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2) (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2) Conversely, CA is not made aware of whether any disciplinary action is taken against a user who performs an unauthorized access who works in another Department organization or another federal agency.

The Department's guide[18] on performance and conduct of Civil Service employees is followed by CA management when disciplining Civil Service employees who work for CA.[19] This guide does not apply to contract employees, Foreign Service employees, or employees of other federal agencies. According to officials of CA/HRD, no CA employee has been reprimanded for inappropriately accessing PIERS records, and if this type of misconduct occurred in the past, it was handled at the supervisory level.

CA/HRD officials told OIG that there is no all-inclusive guidance for disciplining all types of PIERS users. For example, although CA supervisors can discipline their federal employee staffs, some of the CA employees are union members, so the supervisors must also follow union rules when applying disciplinary actions. CA management does not believe it has the authority to discipline Department employees outside CA. Further, contract supervisors, rather than CA management, discipline contract employees. CA officials said that they have limited knowledge of actions taken by officials in other Department organizations or other federal agencies for either federal or contract staff.

OIG contacted SSA and TIGTA officials to obtain information regarding how these agencies discipline their employees and contractor staff with respect to unauthorized access to PII data. Both SSA and IRS officials explained that they have developed specific guidelines that address penalty determinations in response to unauthorized access, which include reprimands, suspensions, dismissal, and prosecution. They provide this information, in the form of

[18] "Addressing Unacceptable Performance and Conduct of Civil Service Employees," U.S. Department of State, Bureau of Human Resources, Office of Employee Relations, revised January 2007.

[19] The first response to misconduct is to provide informal oral or written counseling to the employee to inform the employee of what was done wrong and what improvements are needed. Because CA/HRD follows progressive discipline, CA/HRD is not involved in this first phase. If the misconduct continues, formal action involving CA/HRD is taken whereby the manager writes a Letter of Reprimand, which details the misconduct, and which is then placed in the employee's Official Personnel Folder in the Bureau of Human Resources for 1 or 2 years. If the misconduct continues, the next step is suspension.

guidebooks, for all employees and managers. For example, the IRS guidebook includes a description of offenses; applicable penalties for first, second, and third offenses; and key factors to consider in applying the penalty.

OIG is aware that developing and implementing such guidance could be complicated because users include contract, Civil Service, Foreign Service, and union employees of the Department and other agencies, all of whom have their own set of standards, rights, and requirements. Nevertheless, OIG believes that for consistency and to prevent disparate treatment, the Department needs to determine the feasibility of developing and communicating a set of minimum disciplinary actions that can be applied to all users of passport systems. Therefore, CA/HRD should work with the Bureau of Human Resources to consider specific disciplinary guidelines that include a range of disciplinary actions and penalties to address user violations for passport systems.

> **Recommendation 17:** OIG recommends that the Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, determine the feasibility of developing and implementing specific disciplinary guidelines and a table of disciplinary actions and penalties to address unauthorized access to passport information. Consideration should be given to addressing all passport system users, including contractors, within the Department of State and with other agencies.

In their responses, neither CA nor HR concurred with the recommendation. In its response, CA stated:

> In response to the instances of unauthorized access to the passport records of presidential candidates, CA and HR have developed procedures for administering progressive discipline for cases of unauthorized access and/or misuse of personally identifiable information contained in passport databases. HR/ER/CSD specifically advised against developing a table of penalties for progressive discipline because guidelines already exist within the Department's existing system of progressive discipline. In addition, any policy developed would not be applicable to both outside agencies and contractors as they do not fall within the jurisdiction of CA and HR for disciplinary action. For contractors, CA will coordinate with the appropriate Contracting Officer/Contracting Officer's Representative to contact the company of the person suspected or confirmed of unauthorized access to take appropriate disciplinary action. For outside agencies, CA will contact the appropriate point of contact as specified in the Memorandum of Understanding, or as otherwise directed by the federal agency, to share the passport data for appropriate disciplinary action. CA always maintains the ability to suspend access to employees, to include contractors, and federal agency employees, where it determines unauthorized access has occurred.

In its response, HR stated:

> Specific disciplinary guidelines and a table of disciplinary actions and penalties to address unauthorized access to passport information are not necessary. The Department’s regulations at 3 FAM 4370 and 3 FAM 4321 set forth the guidelines for handling discipline, and these guidelines are sufficient to address misconduct related to accessing PIERS records. Similarly, the Department’s regulation at 3 FAM 4377 provides the list of disciplinary offenses and penalties. The intent of the table is to serve as a general guide only, to provide a broad-range of offenses and penalties (reprimand to removal), and is not intended to provide an exhaustive list of every possible job-related offense. In practice, this table is referenced as a guide for discipline against both Civil Service and Foreign Service employees. The table includes “improper use of official authority or information” as a nature of offense that could adequately address misconduct related to accessing PIERS records. It is not necessary to add to the existing list of offenses or create a separate table. Contractors and other non-DOS employees are disciplined by their respective employers. The Department has no authority to discipline such individuals.

OIG understands the position presented by CA and HR against developing and implementing specific disciplinary guidelines and a table of disciplinary actions and penalties to address unauthorized access to passport information. However, given the government-wide emphasis on safeguarding PII and the practices of other agencies with similar unauthorized access concerns (i.e., IRS and SSA), OIG believes that CA and HR should determine the feasibility of developing disciplinary guidelines and actions for all types of passport system users—internal and external. OIG believes that establishing and communicating disciplinary actions would also serve as a deterrent to unauthorized accesses. Further, OIG does not believe that the FAM sections cited adequately address OIG’s concerns, because 3 FAM 4321 applies only to Civil Service and 3 FAM 4370 and 4377 apply only to Foreign Service personnel. In addition, CA will need to modify its MOUs with external agencies to address even minimal disciplinary actions, such as deactivating the account of a user with a suspected unauthorized access violation, while an investigation commences. In consideration of the positions presented by CA and HR, OIG has modified the recommendation.

On the basis of both responses, OIG considers this recommendation unresolved. This recommendation can be considered resolved when CA and HR agree to determine the feasibility of developing and implementing the disciplinary guidelines and the table. The recommendation can be closed when OIG receives documentation that the feasibility study has been completed.

Other Matters

During its review, OIG was also made aware of other activities that raise concerns about the safeguarding of PII in passport systems relating to both Department and non-Department users.

Required Reviews Identify Security Vulnerabilities With Passport Systems

PIERS is identified as a major system of the Department under the Federal Information Security Management Act (FISMA). As such, it is required to undergo periodic certification and accreditation[20] by IRM's Office of Information Assurance (IRM/IA). Access control testing is part of the certification testing performed to support the Authorization Decision that PIERS can be used or operated. According to IRM/IA officials, reviews of access controls were performed for both PIERS and PRISM. The system administrators, under the authority of the system owner (CA), review user-level access and provide the results of annual testing of selected security controls to IRM/IA for review. According to IRM/IA officials, through the certification and accreditation process, the vulnerabilities and safeguards to prevent breaches in PIERS are known. An IRM representative is on the Working Group and also participates on two of the functional areas that are addressing planned system changes and enhancements that are designed to further protect PII data contained in PIERS and other CA passport systems.

Another FISMA and OMB requirement is the conduct of the Privacy Impact Assessment (PIA),[21] which, for PIERS, is submitted by CA to A/ISS/IPS. The representatives of A/ISS/IPS conduct a "privacy review," in which they examine the mission-related necessity of each element of collected PII as explained by the systems owner in the PIA. However, an official with A/ISS/IPS told OIG that the office is not equipped to perform a technical test of the system but tries to validate the information in the PIA to the extent possible. Ultimately, the office depends on the system owner to complete the PIA accurately. According to this official, the PIA for PIERS is currently being updated.

OIG reviewed the most recent (undated) PIA for PIERS. Regarding the controls in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access, the PIA states:

> PIERS tracks and logs the activities of system users. It logs the authorized user and timestamp in which it was accessed. Training materials provided during employee orientation define the proper use and handling of privacy related data.

Regarding the question of whether other agencies share data or have access to the data in this system, the response in the PIA was "No."

The PIA information appears to contradict what OIG observed during the course of this review. While PIERS may track and log user access, it does not maintain information regarding what specific activities were conducted or why the system was accessed. Further, CA officials

[20] Certification and accreditation require documentation of security planning, including risk assessments, contingency plans, incident response plans, security awareness and training plans, information systems rules of behavior, configuration management plans, security configuration checklists, privacy impact assessments, and system interconnection agreements.

[21] A Privacy Impact Assessment (PIA) is a process for examining the risks and ramifications of using information technology to collect, maintain, and disseminate information in identifiable form from or about members of the public and for identifying and evaluating protections and alternative processes to mitigate the impact to privacy of collecting such information.

have stated to OIG that the data in PIERS is accessed by other agencies via the CCD web portal and as coordinated through Memoranda of Understanding and Memoranda of Agreement.

Recommendation 18: OIG recommends that the Bureau of Consular Affairs ensure the accuracy of its Privacy Impact Assessments (PIA) for PIERS regarding all user access (internal and external) and review the PIAs for all other passport systems to accurately reflect security controls for and risks to personally identifiable information.

In its response, CA agreed with the recommendation, stating:

> CA conducts regularly scheduled PIAs on all its databases and applications to include PIERS. As a result of the incidents of unauthorized access, we are in the process of reevaluating the level of detail associated with the PIA so they can more accurately measure the Bureau's exposure to breaches of PII.

On the basis of CA's response, OIG considers this recommendation resolved. This recommendation can be closed when OIG receives the results of the reevaluation of the PIA for PIERS.

System-Wide Review Needed to Identify Vulnerability and Risk

OMB mandated federal agencies to review their current holdings of all PII and to ensure, to the maximum extent practicable, that such holdings are accurate, relevant, timely, and complete and reduce them to the minimum necessary for the proper performance of a documented agency function.[22] These system reviews should be completed every 3 years. A/ISS/IPS officials said that they plan to work with the Department's bureaus and offices to meet this mandate, including CA's passport operations. As part of this effort, A/ISS/IPS officials indicated that they would like to undertake an end-to-end business process review that will encompass both the handling of the hard-copy passport application and its imaging and storage in the various computer systems and databases (see Appendix B). However, A/ISS/IPS officials stated that the office does not presently have the resources available to begin this task.

Officials from CA/PPT/TO also believe that an examination of the vulnerabilities and weaknesses of all passport systems should be conducted, even of those passport systems that are within the normal 3-year review cycle. The office has previously requested, but has not received, funding to begin such reviews. In addition, the Working Group is proposing that vulnerability and risk assessments be performed for all passport systems.

Given the weaknesses and data vulnerabilities identified in PIERS during this review, OIG fully agrees that such examinations of vulnerabilities and weaknesses in passport systems are warranted and necessary. Accordingly, OIG believes that the Department should make resources available to conduct the assessments as quickly as possible.

[22] "Safeguarding Against and Responding to the Breach of Personally-Identifiable Information," OMB M-07-16, dated May 22, 2007.

> **Recommendation 19:** OIG recommends that the Bureau of Administration, in coordination with the Bureau of Consular Affairs, conduct the necessary vulnerability and risk assessments of all passport systems and report the results of the assessments to the Bureau of Information Resource Management, Office of Information Assurance, and to OIG no later than 120 days after issuance of this report. The report of the results of the assessments should include recommendations to address any weaknesses and vulnerabilities identified, as well as a timetable for implementing corrective actions.

Both A and IRM responded to and agreed with this recommendation. CA did not respond.

In its response, A stated:

> The Bureau of Administration (A) concurs with the OIG's recognition that system wide reviews are needed to identify vulnerabilities and risks in systems containing Personally Identifiable Information. As further noted in the report, the requirement to conduct Privacy Impact Assessments allows system owners to identify potential privacy risks. To this end, the A Bureau concurs with the objective that the Bureau of Consular Affairs (CA) work with both the A Bureau and the Office of Information Resource privacy reviews to ensure a comprehensive evaluation and where necessary, create mitigation strategies to address vulnerabilities. The A Bureau will coordinate its findings with the Office of Information Resource Management, which is responsible for conducting *Vulnerability and Risk Assessment*. Also, the A Bureau concurs with the statement that timely reviews and reports cannot be done without adequate resources for not only CA systems, but also other Department systems containing PII.

In its response, IRM stated:

> IRM's Office of Information Assistance (IA) stands ready to assist CA in their efforts to update the vulnerability and risk assessments of their passport systems. Likewise, IA stands ready to assist A in ensuring that the update Privacy Impact Assessments are incorporated into the certification and accreditation packages of those passport systems.

On the basis of A's and IRM's responses, OIG considers this recommendation resolved. This recommendation can be closed when OIG receives evidence that the necessary vulnerability and risk assessments of the passport systems have been completed and a corrective action plan is reported to IRM/IA.

Re-disclosure of Passport Records to Third Parties

CA's policy, as stated to OIG and included in CA's MOUs with agencies that have been given access to PIERS data, is that requests by third parties for information from passport

databases must be directed to CA for decision and/or assistance. Agencies are not permitted to furnish or make accessible any such information to any third party (including Congress, the Government Accountability Office, courts, and the general public) without the prior written consent of CA. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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Although the Department currently has a draft MOU with DHS for review and approval, CA currently does not have an MOU in effect with DHS. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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(b) (2)(b) (2)(b) (2)(b) (2)(b) (2) OIG noted that neither the draft MOU with that agency nor two final MOUs with other agencies that OIG reviewed contain any language describing what actions should be taken against users guilty of third party disclosure or by CA against the agency, such as suspending access, or any requirement for the agency to notify CA if it learns that PIERS data has been shared with third parties. It is OIG's understanding that specific restrictions in the MOUs are necessary to prohibit such disclosures by other agencies.

A CA/PPT/L official told OIG that while CA had considered establishing policies and procedures for addressing third party disclosures, none were in place and there were no established guidelines for imposing disciplinary or other actions on a passport system user or the user's agency that provides the information to a third party. The CA/PPT/L official suggested that the Department have, at a minimum, the ability to suspend the user's access to PIERS. The official also suggested that annual refresher training emphasizing this subject be required of all users, especially those users not located within CA.

Recommendation 20: OIG recommends that the Bureau of Consular Affairs (CA) (a) develop policies and procedures that address third party disclosure requirements and breaches, to include notification to CA that such a disclosure occurred and potential disciplinary and other actions that are available to CA against the individual who gave that information to the third party and the individual's agency; and (b) include these requirements and restrictions in all of its MOUs with agencies that access PIERS data.

In its response, CA agreed with the recommendation, stating:

CA/PPT is in the process of evaluating all of the current MOU's with the federal agencies that are granted access to the PIERS database, or are provided information from it, to ensure the proper provisions are in place to detail the procedures to follow for disclosing information to third parties and the actions to take if information is provided without State approval/consent. CA will also ensure appropriate cases are coordinated for investigation as warranted.

Based on comments received and discussions held on the draft of this report, OIG clarified the finding and recommendation for this discussion in this final report. On the basis of CA's response, OIG considers this recommendation resolved. This recommendation can be closed when OIG receives evidence that CA has established policies and procedures addressing third party issues and has included these requirements and restrictions in all established MOUs with agencies that access PIERS data.

Memoranda of Agreement and Memoranda of Understanding With Other Federal Agencies

According to CA, about 8,000 (or 40 percent) of PIERS users work for federal agencies other than the Department, with the majority (about 7,700 users) associated with DHS. CA has an MOA or an MOU with each of these agencies that formalizes the relationships and defines the responsibilities of each of the parties. These agencies include the following:

- Department of Homeland Security
- Human Smuggling and Trafficking Center (Department of State)
- (b) (2)(b) (2)(b) (2)(b) (2)(b) (2) (Department of Justice)
- Office of Personnel Management
- Social Security Administration
- Federal Bureau of Investigation

OIG's review of two such MOUs found that although they addressed privacy concerns and access to PIERS data, there were some differences in content and the specificity of the agreements. For example, one MOA stated that the agency "shall identify in writing to Consular Affairs the specific measures taken, or expected to be taken, regarding the protection of information from unauthorized disclosure." The other MOU did not contain this requirement. Neither MOU stated that CA had the right to restrict, remove, or deny access to users found to have accessed or disclosed PIERS data inappropriately.

Several of the recommendations in this report, as well as recent initiatives by CA (especially the move to develop and implement tiered access to PIERS), will make it necessary to revise the MOAs and MOUs to address specific issues and actions. OIG believes that other agencies and entities should be held accountable and should hold their users to at least the same standards and requirements as those of Department users.

Recommendation 21: OIG recommends that the Bureau of Consular Affairs review its Memoranda of Agreement and Memoranda of Understanding with all other federal agencies and other entities to ensure that they are revised to adequately and specifically address issues related to PIERS and the passport data it contains, including the following:

- periodic verification that users and certifying authorities are in positions that merit their access to PIERS;
- annual certifications by users and certifying authorities that they have read and understand the Privacy Act and their obligation to safeguard passport records and the privacy of passport applicants;

- annual training for and responsibilities of certifying authorities, including disabling access/deactivating users' accounts immediately when access is no longer merited;
- specific guidance, criteria, and requirements to ensure that agencies provide only the level of access required by each user when tiered access to PIERS is implemented;
- oversight responsibilities for all appropriate Department and other agency officials to ensure that access levels are properly assigned and maintained;
- the agency's responsibilities for preventing, detecting, and reporting breaches and the Department's rights when it detects possible breaches made by other agency personnel; and
- minimum actions, such as deactivation of access, for identified violators who either access records improperly or authorize unnecessary levels of access.

In its response, CA agreed with the recommendation, stating:

> CA/PPT is in the process of evaluating all of the current MOU's with the federal agencies that are granted access to the PIERS database and reaching out to the various points of contact for each MOU. CA plans to amend each MOU so each action item above is incorporated.

On the basis of CA's response, OIG considers this recommendation resolved. This recommendation can be closed when OIG receives evidence that CA has amended the MOUs with other agencies that have access to PIERS data.

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List of Recommendations

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Recommendation 8: OIG recommends that the Bureau of Consular Affairs consider the types of controls that the Treasury Inspector General for Tax Administration, the Internal Revenue Service, and the Social Security Administration have put in place to protect electronic personally identifiable information and develop and implement a comprehensive and coordinated strategy for proactively preventing and detecting incidents of unauthorized access to PIERS.

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Recommendation 17: OIG recommends that the Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, determine the feasibility of developing and implementing specific disciplinary guidelines and a table of disciplinary actions and penalties to address unauthorized access to passport information. Consideration should be given to addressing all passport system users, including contractors, within the Department of State and with other agencies.

Recommendation 18: OIG recommends that the Bureau of Consular Affairs ensure the accuracy of its Privacy Impact Assessments (PIA) for PIERS regarding all user access (internal and external) and review the PIAs for all other passport systems to accurately reflect security controls for and risks to personally identifiable information.

Recommendation 19: OIG recommends that the Bureau of Administration, in coordination with the Bureau of Consular Affairs, conduct the necessary vulnerability and risk assessments of all passport systems and report the results of the assessments to the Bureau of Information Resource Management, Office of Information Assurance, and to OIG no later than 120 days after issuance of this report. The report of the results of the assessments should include recommendations to address any weaknesses and vulnerabilities identified, as well as a timetable for implementing corrective actions.

Recommendation 20: OIG recommends that the Bureau of Consular Affairs (CA) (a) develop policies and procedures that address third-party disclosure requirements and breaches, to include notification to CA that such a disclosure occurred and potential disciplinary and other actions that are available to CA against the individual who gave that information to the third party and the individual's agency, and (b) include these requirements and restrictions in all of its MOUs with agencies that access PIERS data.

Recommendation 21: OIG recommends that the Bureau of Consular Affairs review its Memoranda of Agreement and Memoranda of Understanding with all other federal agencies and other entities to ensure that they are revised to adequately and specifically address issues related to PIERS and the passport data it contains, including the following:

- periodic verification that users and certifying authorities are in positions that merit their access to PIERS;
- annual certifications by users and certifying authorities that they have read and understand the Privacy Act and their obligation to safeguard passport records and the privacy of passport applicants;
- annual training for and responsibilities of certifying authorities, including disabling access/deactivating users' accounts immediately when access is no longer merited;
- specific guidance, criteria, and requirements to ensure that agencies provide only the level of access required by each user when tiered access to PIERS is implemented;
- oversight responsibilities for all appropriate Department and other agency officials to ensure that access levels are properly assigned and maintained;
- the agency's responsibilities for preventing, detecting, and reporting breaches and the Department's rights when the Department detects possible breaches made by other agency personnel; and
- minimum actions, such as deactivation of access, for identified violators who either access records improperly or authorize unnecessary levels of access.

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Abbreviations

A	Bureau of Administration
A/ISS	Office of Information Sharing Services
A/ISS/ISP	Information Programs and Services
CA	Bureau of Consular Affairs
CA/CST	Computer Systems and Technology
CA/HRD	Human Resources Division
CA/PPT	Directorate of Passport Services
CA/PPT/FO	Office of Field Operations
CA/PPT/IIC	Office of Passport Integrity and Internal Controls Program
CA/PPT/L	Office of Legal Affairs and Law Enforcement Liaison
CA/PPT/POD	Senior Passport Operations Manager
CA/PPT/PPS	Office of Planning and Program Support
CA/PPT/TO	Office of Technical Operations
CA/PPT/WN	Washington Passport Agency
CCD	Consular Consolidated Database
CLASP	Consular Lost and Stolen Passport
CRG	Data Breach Core Response Group
Department	Department of State
DHS	Department of Homeland Security
DS	Bureau of Diplomatic Security
FAM	Foreign Affairs Manual
FBI	Federal Bureau of Investigation
FISMA	Federal Information Security Management Act
FSI	Foreign Service Institute
HR	Bureau of Human Resources
IRM	Bureau of Information Resource Management
IRM/IA	Office of Information and Assurance
IRS	Internal Revenue Service
MIS	Management Information System
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NIST	National Institute of Standards and Technology
OIG	Office of Inspector General
OMB	Office of Management and Budget
OPM	Office of Personnel Management
PIA	Privacy Impact Assessment
PIERS	Passport Information Electronic Records System
PII	Personally Identifiable Information
PLOTS	Passport Lookout Tracking System
PPGB	Privacy Protection Governance Board
PRISM	Passport Records Imaging System Management
SSA	Social Security Administration
TDIS	Travel Document Issuance System
TIGTA	U.S. Treasury Inspector General for Tax Administration

Appendix A

OIG Study – Access to Passport Information of High-Profile Individuals

The Office of Inspector General (OIG) conducted a study of the passport records of 150 high-profile individuals to determine whether the unauthorized accesses to the files of three U.S. Senators in January and March 2008 were isolated instances or indications of a larger problem. The study was conducted to identify indications of potential unauthorized accesses. OIG also used the study to gain information on the controls and processes the Bureau of Consular Affairs (CA) had in place to safeguard passport records. The methodology and results of the study are discussed below.

Methodology

As discussed in the report, OIG reviewed the list of high-profile names that the Department of State included in its Monitor system and found that it was very limited in the number and types of individuals captured. For example, the list contained the names of 38 of about 127 million passport holders and excluded many other high-profile individuals, including key political figures, celebrities, and other prominent people frequently mentioned in the media.

To conduct this study, OIG developed its own list of individuals whose occupations or achievements made them newsworthy. Categories of individuals included politicians; movie, television, and media personalities; musicians; and athletes. After developing the categories, OIG used several sources to select the names. For example, OIG examined Google's 2007 and 2006 lists of most searched names and used lists developed by *Forbes* magazine (lists of top 100 celebrities and 400 richest Americans), MSN Encarta (10 Most Powerful American Women), and *Sports Illustrated* ("The Fortunate 50" highest paid athletes in 2007). OIG also selected the names of individuals who had been recently reported about in the media. After judgmentally selecting the 150 names, OIG researched the Internet to determine each individual's full legal name and date and place of birth. This level of identification allowed CA to more efficiently search for passport records for the individuals.

OIG provided the list to CA and requested detailed information on how many times, if any, the passport records of each individual had been accessed from September 2002 through March 2008. To fulfill OIG's request, CA had to take the following actions:

- search—in some cases multiple times using variations of the OIG provided-information—each individual's name to determine whether passport records existed;
- enter each individual's passport number, or numbers if they had multiple passports, into the Monitor system; and

- query the Monitor system for each passport number—only 10 “hits”[a] per record could be viewed and printed at a time.

OIG received the results of this research in hard-copy form on April 4, 2008, and compiled the information manually. This involved reviewing the results of each individual to determine whether and how many times the individual’s records had been accessed (hit). After OIG issued its draft report and held subsequent discussions with CA officials, on June 18, 2008, CA provided an electronic spreadsheet containing different results. While the April data was produced by Monitor’s standard query of PIERS, the June data was extracted from PIERS using a query created specifically for this purpose. Although OIG did not attempt to verify the reliability of either set of data, OIG noted, when it compared both sets of data, that there were several omissions in the April data. For example, the OIG found records in the June results that should have been included in the April results. Therefore, OIG used the June data and updated the analysis and results for the final report.

Results

Of the 150 names included in the study, OIG found that the records of 127 individuals, or 85 percent, had been accessed at least one time. The query results showed a total of 4,148 hits to the passport information for these individuals. OIG made no determination as to whether the hits, as shown in Table 1, represented authorized or unauthorized access.[b]

Table 1. Access to PIERS Passport Files

0	23
1 – 25	85
26 – 50	15
51- 75	15
76 – 100	3
101 or more	9

Source: OIG analysis based on CA data provided June 18, 2008.

Although an 85 percent hit rate appears to be excessive, the Department currently lacks criteria to determine whether this is actually an inordinately high rate.

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[a] A hit could represent one of the following actions: searched for a passport, viewed a passport application, viewed supporting documentation (one hit per each page viewed), or printed an item (application or supporting documentation). Therefore, for example, if a user searched for a passport, viewed the application, and printed a copy of the application, it would register as three “hits.”

[b] (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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(b)(2)

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Appendix B

Descriptions of Major Passport System Components

Consular Consolidated Database (CCD)

The Consular Consolidated Database, or CCD, is the database (b) (2)(b) (2)(b) (2)(b) (2)(b) (2) that holds all of the current and archived data from all of the Consular Affairs post databases around the world, and it consists of several interconnected database, web, and other servers in multiple locations. The CCD also provides access to passport data in TDIS, PLOTS, and PIERS. In addition, other data is integrated into the CCD, e.g., the "Master Death Database," from the Social Security Administration. The CCD supports query and reporting requirements, data entry requirements, as well as the full recovery of post databases. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2) (b) (2) (b) (2)

Data in the CCD is generally presented to users via parameter driven reports which can be selected from a menu on the left side of the screen. The various CCD services and reports are divided into sections based on CA functions, such as immigrant visas, nonimmigrant visas, and other areas such as Administrative. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)

The CCD(b) (2)(b) (2)(b) (2)(b) (2) accessed via a web browser, such as Internet Explorer(b) (2)
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(b) (2)(b) (2)(b) (2)

Consular Lost and Stolen Passport (CLASP) Database

CLASP is PPT's system for recording Lost and Stolen passports and reporting those passports to U.S. Customs. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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Consular Lookout and Support System (CLASS)

CLASS is a part of PPT's Namecheck system. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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Management Information System (MIS)

MIS is a reporting application used to parallel query multiple databases for passport production, labor and staffing data to produce various management reports.

Passport Information Electronic Records Systems (PIERS)

The Passport Information Electronic Records System(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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Passport Lookout Tracking System (PLOTS)

The Passport Lookout Tracking System is a software program(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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Passport Records Imaging System Management (PRISM) database

PRISM is a digital imaging system used on-site at passport agencies that scans and stores information in an easily retrievable format. (b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)
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(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)(b) (2)

Travel Document Issuance System (TDIS)

The Travel Document Issuance System (TDIS) is used domestically to manage the entirety of the passport issuance process from application receipt and payment through data entry, adjudication, printing and quality control.

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Appendix C

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Appendix F

Laws, Directives, and Guidance on Protecting Personally Identifiable Information

The federal government has set forth requirements to protect personally identifiable information (PII) and to safeguard information maintained in computer systems. In addition, the Department of State and the Bureau of Consular Affairs have issued written guidance addressing access to and protection of passport records in their systems. Governing laws, directives, and guidance relating to the protection of passport data and systems are in Table 1.

Table 1. Laws, Directives, and Guidance

The Privacy Act of 1974 (as of January 3, 2005)	This law mandates agencies to establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records and to protect against any anticipated threats or hazards to their security or integrity that could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom information is maintained. (5 U.S.C. § 552a)
Computer Fraud and Abuse Act 18 U.S.C. § 1030	This is a computer security law that protects computers in which there is a federal interest, such as federal computer systems. Violation of this law potentially triggers subsection (a)(2)(B), which outlaws obtaining information by unauthorized computer access. Anyone who "intentionally accesses a computer without authorization or exceeds authorized access, and thereby obtains [. . .] information from any department or agency of the United States" has violated this provision and is subject to the criminal penalties described in subsection (c). It is important to note that under this provision, the mere attempt to obtain information by unauthorized computer access is a crime subject to the penalties cataloged in subsection (c). 18 U.S.C. § 1030(b). Paragraph (a)(2) is a somewhat unusual conversion statute in that it does not require any larcenous intent. The attendant penalties include the following array: • Simple violations: not more than one year of imprisonment and/or a fine under title 18 • Violations for gain or involving more than $5000: not more than five years of imprisonment and/or a fine under title 18 • Repeat offenders: not more than ten years of imprisonment and/or a fine under title 18

OMB Memorandum M-07-16, “Safeguarding Against and Responding to the Breach of Personally Identifiable Information”[*] (May 22, 2007)	This Office of Management and Budget (OMB) memorandum requires agencies to: • establish safeguards to ensure the security and confidentiality of records and • protect against any anticipated threats or hazards to their security or integrity that could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom the information is maintained.
OMB A-130 (Revised), ***Management of Federal Information Resources*** **(Transmittal Memorandum #4, 11/28/2000)**	This circular requires agencies to: • ensure that information is protected commensurate with the risk and magnitude of the harm that would result from the loss, misuse, or unauthorized access to or modification of such information and • limit the collection of information which identifies individuals to that which is legally authorized and necessary for the proper performance of agency functions.
NIST Special Publication 800-53 (Revision 2), ***Recommended Security Controls for Federal Information Systems*** **(December 2007)**	This National Institute of Standards and Technology (NIST) special publication provides guidelines for selecting and specifying security controls for information systems supporting the executive agencies of the federal government. • The organization develops, disseminates, and periodically reviews/updates a formal, documented, access control policy that addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance; • The organization, at a minimum, reviews information systems accounts annually; • The information system enforces the most restrictive set of rights/privileges or accesses needed by users for the performance of specified tasks. • The organization develops, disseminates, and periodically reviews/updates a formal, documented, security awareness and training policy.

[*] OMB Memorandum M-07-16, “Safeguarding Against and Responding to the Breach of Personally Identifiable Information,” was developed in response to Executive Order 13402, Strengthening Federal Efforts to Protect Against Identity Theft. The President established the Identity Theft Task Force to implement the policy. This required OMB to issue data breach guidance to agencies that includes identity theft risk analysis and data breach notification requirements. In addition, agencies are required to review the use of social security numbers to eliminate, restrict, or conceal the personally identifiable information in agency business processes, systems, and paper and electronic forms.

HSPD-1, "Organization and Operation of the Homeland Security Council," October 29, 2001	Securing Americans from terrorist attacks requires coordination across a broad spectrum of Federal, State, and local agencies. Homeland Security Council Policy Coordination Committees shall coordinate the development and implementation of homeland security policies by multiple departments and agencies throughout the Federal government, and shall coordinate those policies with State and local government.
HSPD-7, "Critical Infrastructure Identification, Prioritization, and Protection," December 17, 2003	This directive establishes a national policy for Federal departments and agencies to identify and prioritize United States critical infrastructure and key resources and to protect them from terrorist attacks. This directive specifies that all Federal department and agency heads are responsible for the identification, prioritization, assessment, remediation, and protection of their respective internal critical infrastructure and key resources. Consistent with the Federal Information Security Management Act of 2002, agencies will identify and provide information security protections commensurate with the risk and magnitude of the harm resulting from the unauthorized access, use, disclosure, disruption, modification, or destruction of information.

Foreign Affairs Manual (FAM)	The FAM is the source for the organizational structures, policies, and procedures that govern the operations of the Department; the Foreign Service; and, when applicable, other Foreign Affairs agencies. (2 FAM 1111.2(b)) Key policies with respect to this review include the following: • Access to and use of records by employees are subject to the determination of a need-to-know by offices responsible for the information. (5 FAM 471(a)(2)) • Assistant Secretary for the Bureau of Consular Affairs (CA) develops, establishes, . . . and directs policies, procedures, and regulations relating to functions of the Bureau, including the issuance of passports and related services. (1 FAM 251.1(d)) • An individual's passport information is identified as Sensitive But Unclassified (SBU) information. All SBU information is required to be handled, processed, transmitted, and stored in means that limit the potential for unauthorized disclosure. (12 FAM 544(a)) • Prohibiting the disclosure of records from a Privacy Act "system of records" by any method (written, oral, or electronic) unless the individual to whom the records pertain has consented, unless the disclosure falls under an exemption. (7 FAM 061(c)(3)) • Requiring the Department keep a written accounting of many disclosures. (7 FAM 061(c)(4)) • Prescribes civil remedies and criminal penalties for non-compliance. (7 FAM 061(c)(5)) • A Department employee may not release copies of passport and citizenship records from PIERS or other sources without specific authorization from CA/PPT/ILM/R/RR, which has the responsibility for releasing such records. (7 FAM 064(d)(2)) [NOTE: The FAM has not been updated to reflect the current office symbol and name, which is CA/PPT/L/LE, Office of Legal Affairs, Law Enforcement Liaison Division.]
Notice To All Employees of Passport Services: Privacy Reminder **(Bureau of Consular Affairs, March 25, 2008)**	This Bureau of Consular Affairs notice was issued to emphasize: • Access to passport records (including photographs and related consular records) is authorized only as required for the performance of official duties. • All personnel will be held personally responsible for complying with this requirement. Any failure to adhere to these requirements may lead to disciplinary action, including termination.

Interim Reporting Guidelines for Incidents of Unauthorized Access to Passport Records/Applicant Personally Identifiable Information **(Bureau of Consular Affairs, April 9, 2008)**	The Bureau of Consular Affairs (CA) Directorate of Passport Services issued this interim policy for addressing breaches of passport records and an applicant's personally identifiable information (PII) by a user of a CA database or process that stores or accesses the information. It addresses breaches under three scenarios. These scenarios consist of breaches by government and contract employees of (1) the Directorate of Passport Services, (2) other Department bureaus, and (3) other federal government agencies. Each scenario details what incidents are to be reported, who they are to be reported to, and the timeframes for reporting them. This guidance is to be incorporated into Internal Control Standards and 7 Foreign Affairs Handbook. (See Appendix D)
Personally Identifiable Information Breach Response Policy **(Bureau of Administration, (May 1, 2008)** **NOTE: Although approved, this policy had not been issued as of May 14, 2008.**	This is the Department's official policy for addressing breaches concerning PII that is collected, processed, or maintained by the Department, whether it is reflected in paper records or stored and/or transmitted via Department computer systems, as well as PII stored on non-Department computer systems used by or operated on behalf of the Department. This guidance is consistent with the prescribed framework in OMB Memorandum M-07-16. This policy does not supersede or supplant the requirements imposed or other laws, such as the Privacy Act of 1974. This policy will be incorporated into the Foreign Affairs Manual. (See Appendix E)

Appendix G

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Recommendation 17: OIG recommends that the Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, develop and implement specific disciplinary guidelines and a table of disciplinary actions and penalties to address unauthorized access to passport information. This guidance should address all passport system users, including contractors, from the Department and other agencies.

CA Response: CA does not concur with this recommendation.

In response to the instances of unauthorized access to the passport records of presidential candidates, CA and HR have developed procedures for administering progressive discipline for cases of unauthorized access and/or misuse of personally identifiable information contained in passport databases. HR/ER/CSD specifically advised against developing a table of penalties for progressive discipline because guidelines already exist within the Department's existing system of progressive discipline.

In addition, any policy developed would not be applicable to both outside agencies and contractors as they do not fall within the jurisdiction of CA and HR for disciplinary action. For contractors, CA will coordinate with the appropriate Contracting Officer /Contracting Officer's Representative to contact the company of the person suspected or confirmed of unauthorized access to take appropriate disciplinary action. For outside agencies, CA will contact the appropriate point of contact as specified in the Memorandum of Understanding, or as otherwise

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directed by the federal agency, to share the passport data for appropriate disciplinary action. CA always maintains the ability to suspend access to employees, to include contractors, and federal agency employees, where it determines unauthorized access has occurred.

Recommendation 18: OIG recommends that the Bureau of Consular Affairs ensure the accuracy of its Privacy Impact Assessments (PIAs) for PIERS regarding all user access (internal and external) and review the PIAs for all other passport systems to accurately reflect security controls for and risks to personally identifiable information.

CA Response: CA agrees with this recommendation.

CA conducts regularly scheduled PIAs on all its databases and applications to include PIERS. As a result of the incidents of unauthorized access, we are in the process of reevaluating the level of detail associated with the PIA so they can more accurately measure the Bureau's exposure to breaches of PII.

Recommendation 20: OIG recommends that the Bureau of Consular Affairs develop policies and procedures that address third-party disclosure requirements and breaches, to include disciplinary actions to be taken in response to inappropriate disclosures.

CA Response: CA agrees with this recommendation.

CA/PPT is in the process of evaluating all of the current MOU's with the federal agencies that are granted access to the PIERS database, or are provided information from it, to ensure the proper provisions are in place to detail the procedures to follow for disclosing information to third parties and the actions to take if information is provided without State approval/consent. CA will also ensure appropriate cases are coordinated for investigation as warranted.

Recommendation 21: OIG recommends that the Bureau of Consular Affairs review its Memoranda of Agreement and Memoranda of Understanding with all other federal agencies and other entities to ensure that they are revised to adequately and specifically address issues related to PIERS and the passport data it contains, including the following:

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- periodic verification that users and certifying authorities are in positions that merit their access to PIERS;
- annual certifications by users and certifying authorities that they read and understand the Privacy Act and their obligation to safeguard passport records and the privacy of passport applicants;
- annual training for and responsibilities of certifying authorities, including disabling access/deactivating users accounts immediately, when access is no longer merited;
- specific guidance, criteria, and requirements to ensure that agencies provide only the level of access required by each user when tiered-access to PIERS is implemented;
- oversight responsibilities for all appropriate Department and other agency officials to ensure that access levels are properly assigned and maintained;
- the agency's responsibilities for preventing, detecting, and reporting breaches and the Department's rights when the Department detects possible breaches made by other agency personnel; and
- minimum actions (such as deactivation of access) for identified violators who either access records improperly or authorize unnecessary levels of access.

CA Response: CA agrees with this recommendation.

CA/PPT is in the process of evaluating all of the current MOU's with the federal agencies that are granted access to the PIERS database and reaching out to the various points of contact for each MOU. CA plans to amend each MOU so each action item above is incorporated.

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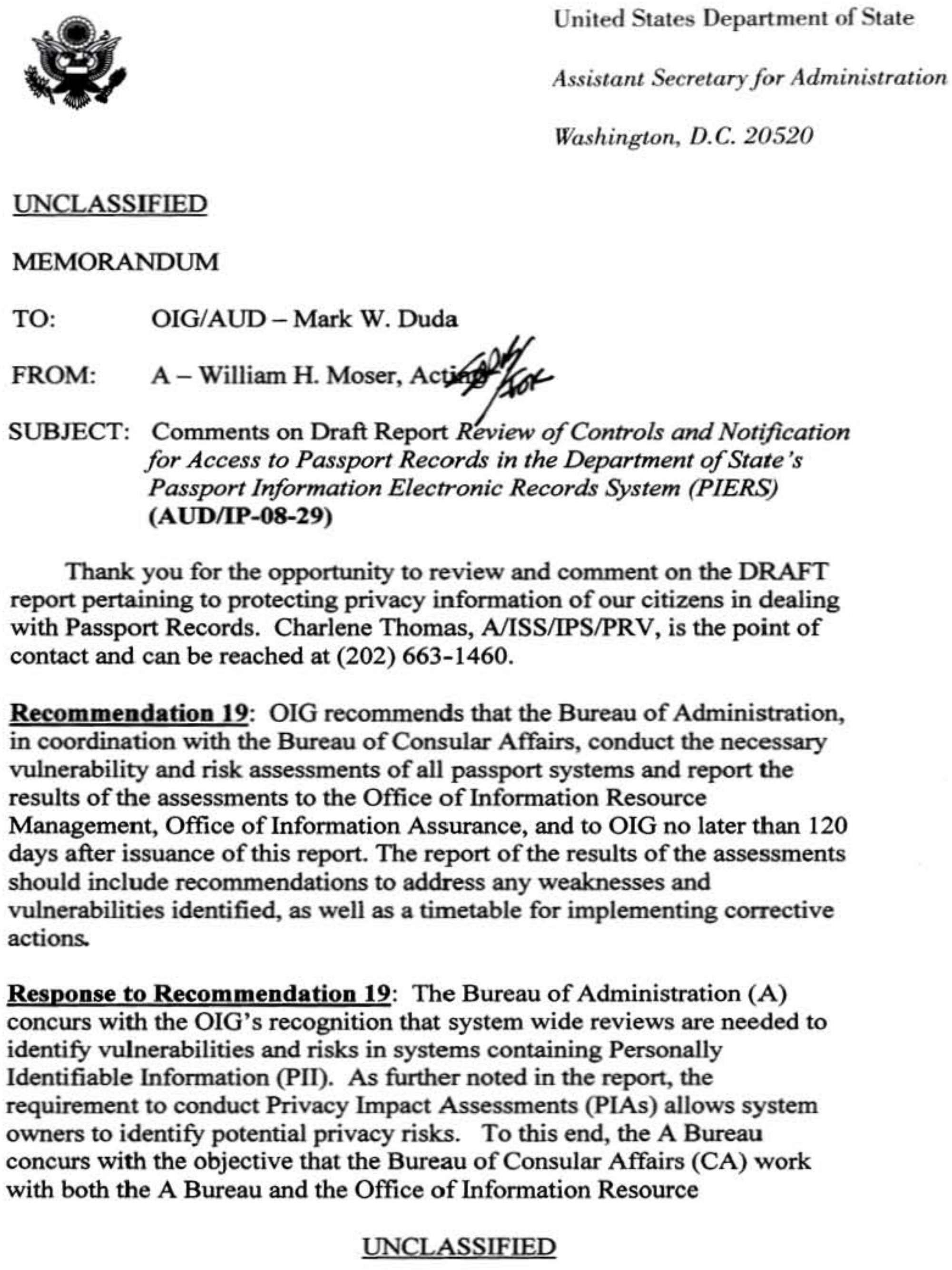
Appendix H

Bureau of Administration Response



United States Department of State

Assistant Secretary for Administration

Washington, D.C. 20520

UNCLASSIFIED

MEMORANDUM

TO: OIG/AUD – Mark W. Duda

FROM: A – William H. Moser, Acting

SUBJECT: Comments on Draft Report *Review of Controls and Notification for Access to Passport Records in the Department of State's Passport Information Electronic Records System (PIERS)* **(AUD/IP-08-29)**

Thank you for the opportunity to review and comment on the DRAFT report pertaining to protecting privacy information of our citizens in dealing with Passport Records. Charlene Thomas, A/ISS/IPS/PRV, is the point of contact and can be reached at (202) 663-1460.

Recommendation 19: OIG recommends that the Bureau of Administration, in coordination with the Bureau of Consular Affairs, conduct the necessary vulnerability and risk assessments of all passport systems and report the results of the assessments to the Office of Information Resource Management, Office of Information Assurance, and to OIG no later than 120 days after issuance of this report. The report of the results of the assessments should include recommendations to address any weaknesses and vulnerabilities identified, as well as a timetable for implementing corrective actions.

Response to Recommendation 19: The Bureau of Administration (A) concurs with the OIG's recognition that system wide reviews are needed to identify vulnerabilities and risks in systems containing Personally Identifiable Information (PII). As further noted in the report, the requirement to conduct Privacy Impact Assessments (PIAs) allows system owners to identify potential privacy risks. To this end, the A Bureau concurs with the objective that the Bureau of Consular Affairs (CA) work with both the A Bureau and the Office of Information Resource

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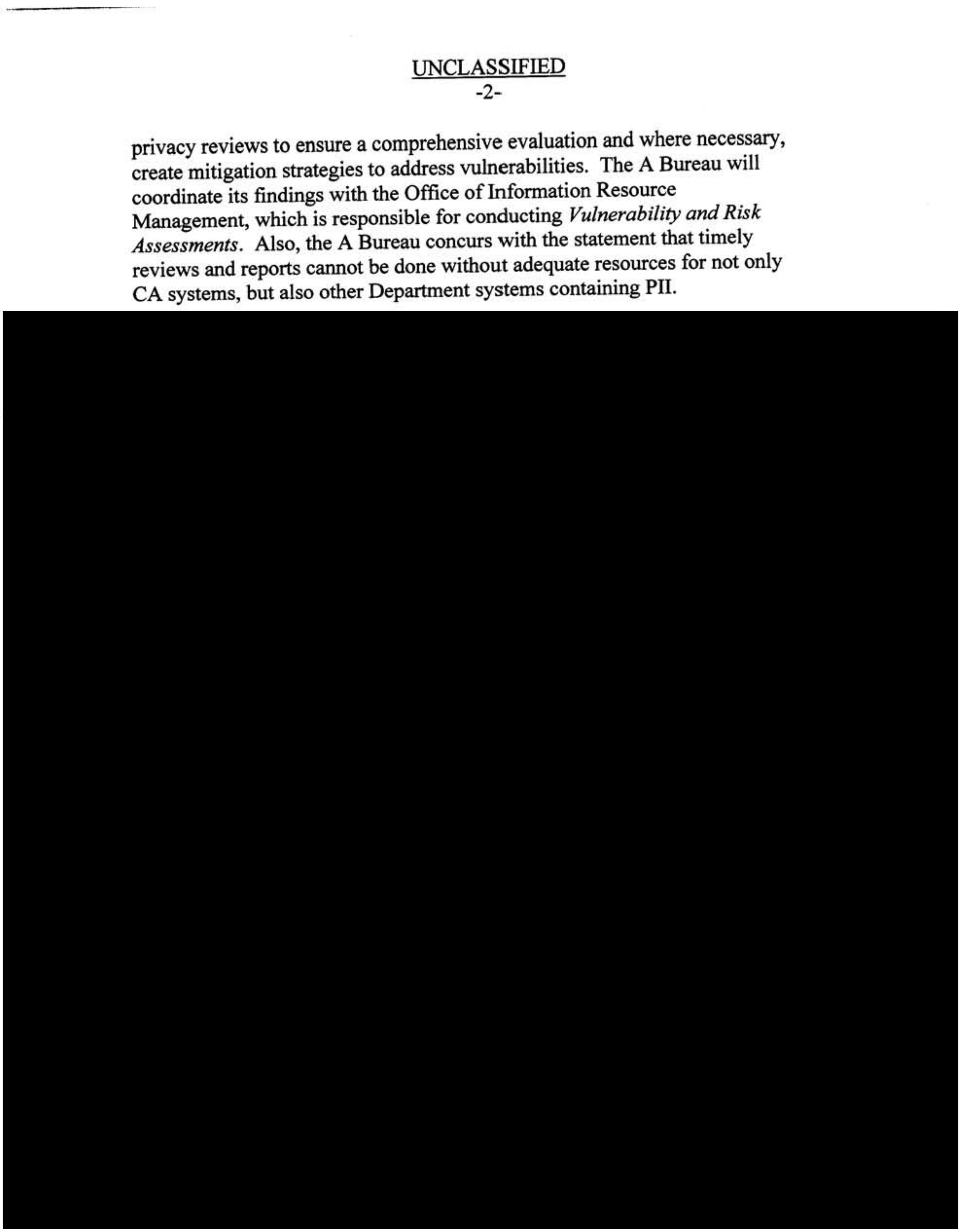

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privacy reviews to ensure a comprehensive evaluation and where necessary, create mitigation strategies to address vulnerabilities. The A Bureau will coordinate its findings with the Office of Information Resource Management, which is responsible for conducting *Vulnerability and Risk Assessments*. Also, the A Bureau concurs with the statement that timely reviews and reports cannot be done without adequate resources for not only CA systems, but also other Department systems containing PII.

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Appendix I

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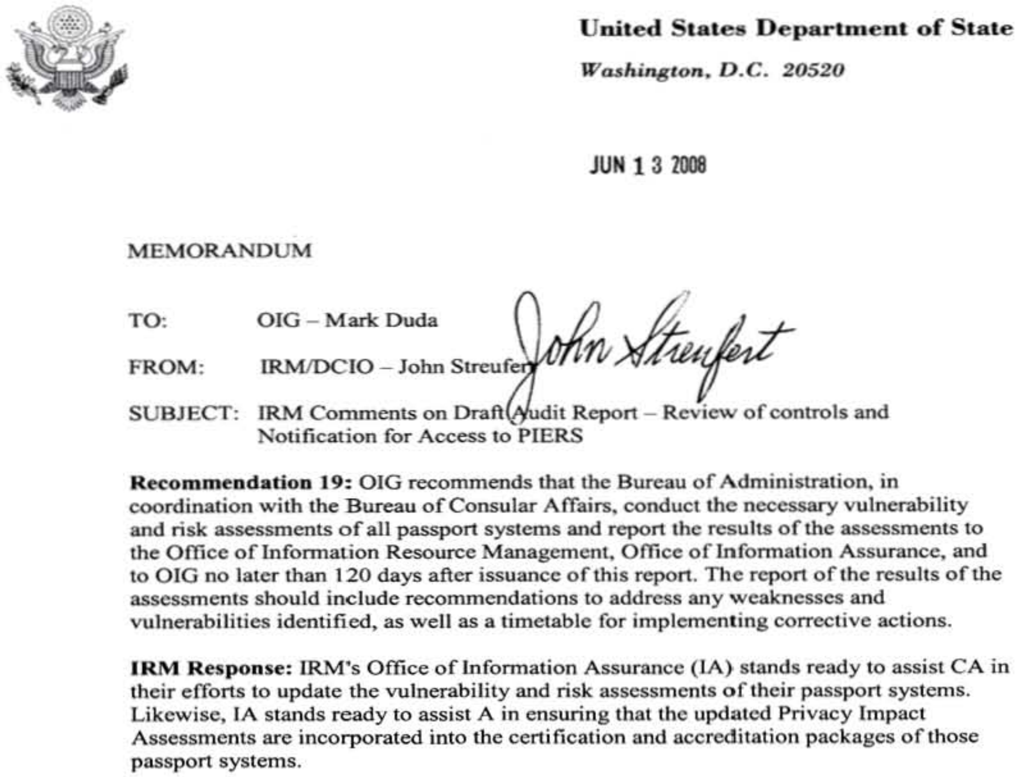
Appendix K

Bureau of Information Resource Management Response



United States Department of State

Washington, D.C. 20520

JUN 1 3 2008

MEMORANDUM

TO: OIG – Mark Duda

FROM: IRM/DCIO – John Streufert John Streufert

SUBJECT: IRM Comments on Draft Audit Report – Review of controls and Notification for Access to PIERS

Recommendation 19: OIG recommends that the Bureau of Administration, in coordination with the Bureau of Consular Affairs, conduct the necessary vulnerability and risk assessments of all passport systems and report the results of the assessments to the Office of Information Resource Management, Office of Information Assurance, and to OIG no later than 120 days after issuance of this report. The report of the results of the assessments should include recommendations to address any weaknesses and vulnerabilities identified, as well as a timetable for implementing corrective actions.

IRM Response: IRM's Office of Information Assurance (IA) stands ready to assist CA in their efforts to update the vulnerability and risk assessments of their passport systems. Likewise, IA stands ready to assist A in ensuring that the updated Privacy Impact Assessments are incorporated into the certification and accreditation packages of those passport systems.