

Department of the Interior
Privacy Impact Assessment Template

Name of Project: Electronic Email Archive System

Bureau: Office of the Chief Information Officer

Project's Unique ID: 010-00-02-07-01-1130—00-116-054

A. CONTACT INFORMATION:

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5) Who is the Bureau/Office Privacy Act Officer

Sue Ellen Sloca

Departmental Privacy Act Officer

Street Address: 1849 C Street, NW, MS 1413

City: Washington State: DC

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes. The system contains personal information about individuals from Internet email and interoffice email, including address of sender and receiver(s), subject, date sent or received, text of message, name of attachment, and attachment text.

a. Is this information identifiable to the individual¹?

(If there is NO information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

Yes.

b. Is the information about individual members of the public?

(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

Yes, this system could contain information about individual members of the public.

c. Is the information about employees? (If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

Yes.

2) What is the purpose of the system/application?

The system's main purpose is to retain and protect emails with subject matter related to the Cobell et al. V. Norton, et al., Federal District Court Case No. 1:96CV01285 litigation. The capability of the system is to retrieve information from an email archive repository in order to facilitate compliance with Court requirements. The system is designed such that DOI can provide assurances that past and future emails and their attachments will be reliably, consistently and automatically captured, archived and retained in a safe and secured environment

¹ "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

3) What legal authority authorizes the purchase or development of this system/application?

- a. 5 U.S.C. 301, 43 CFR 1455, and 40 CFR part 1441.
- b. On September 25, 2002, the Special Master issued an opinion and order approving the Interior Defendants proposal relating to e-mail retention, search, and production.

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

As identified in the Privacy Act system of records notice, Interior-OS-10: Electronic Email Archive System (EEAS), the system contains information on individuals who send and receive electronic messages using Internet email and interoffice email from and to the following designated bureaus and offices involved with Indian Trust. These bureaus/offices are as follows: Office of the Solicitor; Bureau of Indian Affairs; Office of the Special Trustee for American Indians; Office of the Assistant Secretary--Indian Affairs; Bureau of Land Management; Office of the Assistant Secretary--Policy, Management, and Budget; Office of Hearings and Appeals; Office of Historical Trust Accounting; Office of the Secretary; the Minerals Management Service; the Office of Surface Mining; the Bureau of Reclamation; and the National Business Center. The system also covers individuals whose names are contained in the emails.

2) What are the sources of the information in the system?

- a. **Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

Information maintained in the system is collected from the live capture of email and from the restoration of identified email back up tapes. Tapes provided by Interior bureau/office email backup systems from those installations identified in the "Categories of individuals" section (see attached *Federal Register* notice). This information is downloaded onto a hard drive managed by the contractor and stored digitally. Information from Interior bureau/office email servers will be captured in real time, transmitted electronically through secured networks, and captured and stored electronically into the EEAS.

- b. **What Federal agencies are providing data for use in the system?**

No, Federal agency other than Interior is directly providing data for the system. Information captured from email from Federal agencies transmitted to Interior and attachments may contain information from other agencies.

c. What Tribal, State and local agencies are providing data for use in the system?

No, Tribal, State or local agency provides data for this system. Information from these organizations may be captured from email transmissions to Interior and attachments may contain information from these other organizations.

d. From what other third party sources will data be collected?

None. Email will be captured directly from the party sending and receiving electronic messages using Internet email and interoffice email, and those who are referred to in the electronic messages.

e. What information will be collected from the employee and the public?

The name and email address of the sender and receiver are captured along with the bcc, cc, subject line, and the text of the email messages. The source of the information is from emails that originate or are received through DOI email servers that DOI specifies to the contractor. Additionally, previous emails created or received from May 1999 to the present will be recovered and restored by transferring the information from email back up tapes to the EEAS system.

10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)

Individuals do not have opportunities to decline information unless they stop sending emails. An individual maybe asked for consent if proposed use of the information does not fall within one of the Privacy Act exceptions listed in 5 U.S.C. Section 552a(b).
