Privacy Impact Assessment

Name of Project: NARA Online Ordering System

Project's Unique ID: 393-00-01-04-01-005-00

Legal Authority(ies): NARA's GPEA / ENOS and e-Government Program stems from a 1998 OMB mandate: The Government Paperwork Elimination Act (GPEA, Pub. L. 105-277) requires that, when practicable, Federal agencies use electronic forms, electronic filing, and electronic signatures to conduct official business with the public.

Purpose of this System/Application: The NARA Online Ordering System is a Web-based system that is accessible from NARA's *Archives.gov* site. The public can use the system to request, pay for, and track the status of selected NARA product and service orders that are submitted using the Internet. The NARA Online Ordering System provides an intuitive, easy-to-use interface that supports reproduction requests for copies of select archival records and microfilm publication orders and requests for information about NARA's records.

The NARA Online Ordering System also incorporates fulfillment functionality. This enables NARA staff and authorized contractors (acting as NARA agents) to track the processing of customer orders and requests. Payment data is transferred between the NARA Online Ordering System and the Order Fulfillment and Accounting System (OFAS) (See the Glossary descriptions for OFAS and the NARA Online Ordering System for more information.).

Section 1: Information to be Collected

1. Describe the information (data elements and fields) available in the system in the following categories:

    a. Employees. As described in par. 1bii below, information is passed directly from ENOS into OFAS, as such, limited information related to NARA employees or its agents is used in the system (par. 1c outlines the instances that the NARA User ID is used).

    b. External Users. Several types of voluntarily provided information related to the public are used in the system.

        i. Customer Profile Information - includes the following customer-provided information: login ID, password, first name, last name, e-mail address, challenge question, and challenge answer. The latter two types of information

are used to validate a customer's identity for password reset, if needed. Optionally, the customer can voluntarily choose to store shipping address, billing address, and credit card information as part of their profile to automatically insert the information in subsequent online orders.

All customer-provided information is securely stored in the system as outlined in sec. 6, pars. 1 and 3, and is retained until deleted by the customer. Information about the access to this information is provided in sec. 4.

ii. **Transaction Information** – includes information related to a specific order or request that is submitted to NARA via the NARA Online Ordering System, such as item being ordered, shipping recipient and address, credit card number and expiration date, and billing address. This information is passed from the NARA Online Ordering System into OFAS via an automated Extensible Markup Language (XML) interface within NARA's secure internal network for order fulfillment.

iii. **Order History Information** – includes information related to submitted orders and unfinished orders that may be retained by the customer for short-term reference. Customers can access this information with their login ID and password. This information is accessible for up to one year and is in accordance with NARA's Files Maintenance and Records Disposition Data Retention Schedule. "Session" cookies, which support the web-to-database transactions, are used. No "persistent" cookies are downloaded onto the user's computer.

c. **Audit trail information (including employee log-in information).** ENOS maintains audit logs that track user access to the system and records database modifications.

Detailed system logs are maintained for all system processes that run on the NARA Online Ordering System servers. This includes:

i. **Integration logs** that provide details on the orders that are currently sent to OFAS. One log maintains details on the orders that are transferred to OFAS and a second log maintains details on order status updates that are received from OFAS. These are evaluated on a daily basis.

ii. **System logs** also report multiple failed login attempts and system administrator updates to the NARA Online Ordering System environment. System logs are evaluated on a monthly basis and are securely backed-up and stored for possible "after-the-fact" reconstruction of performance or security threats. A description of the NARA Online Ordering System and OFAS is provided in the Glossary of Terms.

The NARA Online Ordering System also maintains audit logs that track the status

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of database or record updates using key system fields: created date, created by, last modified date, last modified by, conflict ID quote number, order number, and order line item number.

i. **Created Date** – the date and time on which a particular record was created in the database. For example, each order in the system stores the date and time the order was created.

ii. **Created By** – the ID of the individual who created a record in the database. For example, the User ID of the person who created an order.

iii. **Last Modified Date** – the date on which the record was last modified. For example, the date when the system updates the order status from "Received" to "Processing".

iv. **Last Modified By** – the User ID of the individual who last modified the record.

v. **Conflict ID** – controls maintained to ensure data integrity in cases where more than one user attempts to access and potentially update the same record in the system.

vi. **Quote Number** – the number associated with a particular quote record in the database. For example, each quote in the system stores the quote number.

vii. **Order Number** – the number associated with a particular order record in the database. For example, each order in the system stores the order number.

viii. **Order Line Item Number** – the number associated with a request line item within a particular order record in the database. For example, each individual request line item within an order in the system stores the order line item number and the business unit assigned to that request line item.

d. **Other (describe).** Non-personal information such as sample images of products and services available for sale, Frequently Asked Questions (FAQs), and the Privacy and Use statement are stored in the system.

2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources?

a. **NARA operational records.** NARA indexes and other related information are used to describe the products (e.g., microfilm publications) and services (e.g., archival material available for reproduction) that can be requested using the NARA Online Ordering System.

b. **External users.** Information cited in par. 1b above, the following customer

profile information is collected from the public for use in the system: login ID, password, first name, last name, e-mail address [optional], challenge question, and challenge answer. The latter two types of information are used to validate a customer's identity for password reset, if needed. Optionally, the customer can voluntarily choose to store shipping address, billing address, and credit card information as part of their profile to automatically insert the information in subsequent online orders.

c. **Employees.** As cited in par.1a above, limited information related to NARA employees or its agents is collected for use in the system (Par. 1c above, outlines the instances that the NARA User ID is used).

d. **Other Federal agencies (list agency).** Currently, no Federal Agency provides data that is used in the system. In the future, NARA may attempt to acquire usage rights for certain indexes to NARA records that have been created by and are in the custody of other Federal Agencies. These third-party indexes may be used to assist customers in identifying NARA holdings.

e. **State and local agencies (list agency).** None

f. **Other third party source.** Payment information is passed from the NARA Online Ordering System to OFAS via an automated XML interface within NARA's secure internal network for credit card validation from a third-party credit card validation service to approve individual credit card transactions before the order is approved and accepted by NARA for fulfillment. Upon approval, the NARA Online Ordering System receives an order status update from OFAS.

Section 2: Why the Information is Being Collected

1. Is each data element required for the business purpose of the system? Explain.
NARA's Strategic Sequencing Process (see sec. 2) ensures that requirements are properly formulated and tested against the production system. This results in an information architecture that reflects only data that is needed to satisfy the functionality of the system.

2. Is there another source for the data? Explain how that source is or is not used?
There is no other source for collecting NARA Online Ordering System data.

Section 3: Intended Use of this Information

1. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed? The system will not derive new data or create previously unavailable data about an individual through aggregation of other collected data.

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2. Will the new data be placed in the individual's record? For NARA employees, the system will maintain information about system login, system logout, and record status changes. For the customer, this is not applicable, as the system will not create or store information about an individual beyond optional profile information (such as user name, billing address and shipping address) that is used to pre-populate information in the online order request.

3. Can the system make determinations about employees/the public that would not be possible without the new data? The system does not make determinations about the public or NARA employees.

4. How will the new data be verified for relevance and accuracy? Users who choose to store information in their user profile are prompted to review the information prior to it being saved in the system. Additionally, the user may edit or delete the profile information at any time.

5. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? Although statistical reports are used to manage the NARA Online Ordering System system, there is no consolidation of system data.

6. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain. Not applicable.

7. Generally, how will the data be retrieved by the user? NARA staff and contractors (acting as authorized agents) access information that is necessary to fulfill, troubleshoot, and ship orders.

8. Is the data retrievable by a personal identifier such as a name, SSN or other unique identifier? If yes, explain and list the identifiers that will be used to retrieve information on an individual. The information is retrieved by order number or customer name. Only those individuals with approved access rights have this authority and data accessibility.

9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them? This is not applicable, as the system only captures customer orders for NARA products and services.

10. Can the use of the system allow NARA to treat the public, employees or other persons differently? If yes, explain. As an online ordering system, there is no possibility of disparate treatment of individuals or groups.

11. Will this system be used to identify, locate, and monitor individuals? If yes, describe the business purpose for the capability and the controls established explain. The system only captures customer orders for NARA products and services, therefore, it does not provide the capability to identify, locate, or monitor individuals.

12. What kinds of information are collected as a function of the monitoring of individuals? This is not applicable, as the system does not support or enable monitoring of individuals.

13. What controls will be used to prevent unauthorized monitoring? This is not applicable, as the system does not support or enable monitoring of individuals.

14. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors? The system does not use persistent cookies or other tracking devices to identify web visitors.

Section 4: Sharing of Collected Information

1. Who will have access to the data in the system (e.g., contractors, users, managers, system administrators, developers, other)?

a. **Customers:** Customers will have access to their own profile information, if they elect to store this information for later access, as well as order history information. (See sec. 1, par. 1b above).

b. **Employees:** Authorized NARA employees have access to production data and to reports that summarize the NARA Online Ordering System operations (e.g., number of submitted orders, average turnaround time for completed orders, number of new users). The data and reports do not contain personally identifiable information.

c. **System Administrator:** The NARA Online Ordering System Administrator has access to system production data, however, encrypted data (e.g., user password and credit card number) cannot be deciphered.

d. **Developers:** Developers only have access to the NARA Online Ordering System test data, however, a limited number of production developers have access to production data. Access is gained through login ID and password authentication. This access is required for initial data migration and trouble report investigation. Again, encrypted data cannot be deciphered.

2. How is access to the data by a user determined and by whom? Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where are they documented (e.g., concept of operations document, etc.).

The NARA Online Ordering System Program Manager is responsible for ensuring that access to the NARA Online Ordering System data is properly controlled throughout the system lifecycle. This oversight ensures that only authorized individuals have access to the system data. The Program Manager, working with the NARA Online Ordering System integrated project team, follows NARA's Strategic Sequencing Process to identify and validate data ownership, establish and maintain administrative controls, and

define and control access rights.

NARA's information technology projects follow a multi-step process, called the Strategic Sequencing Process, to ensure the proper implementation of new technology capabilities. This process guides NARA's transition from its current state of automation environment (or Baseline Architecture) to its planned state of automation (or Target Architecture), and ensures that each information technology project is properly coordinated with other enterprise initiatives.

Six key steps comprise the process: (1) conduct Business Process Reengineering (BPR) efforts, (2) analyze architectural differences and assess technology maturity, (3) select transition opportunities, (4) define/update architectural implementation plan and projects, (5) define/update Information Resource Management (IRM) project portfolio, and (6) implement projects in accordance with NARA's system development lifecycle.

The highly controlled nature of the Strategic Sequencing Process ensures that team members thoroughly understand the business and technology environment, and that responsible NARA stakeholders are aware of and sign-off on major project milestones. These controls ensure that privacy concerns regarding sensitive data are identified and factored into the system design, user access administration, and ongoing system operations.

Details related to data access, including those stated above, are documented in the latest release version of the Concept of Operations, the Version Description Document, and the System Operations Guide. These documents are updated as the NARA Online Ordering System is modified or upgraded.

3. Will users have access to all data on the system or will the user's access be restricted? Explain. The NARA Online Ordering System is a Siebel software application that incorporates numerous access controls that manage the relationship between internal NARA user roles and responsibilities (or access rights), and application data views and database records. These access controls, referred to as Siebel "visibility" controls, determine different sets of views and different sets of records that NARA users can see when they log onto the NARA Online Ordering System. For customers, these controls ensure that they are able to see only their own Customer Profile Information, Transaction Information and Order History, in addition to other non-personal information that is stored for customer reference (see sec.1, par. 1a). The System Administrator oversees the different levels of access.

4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those who have been granted access (please list processes and training materials)? There are two primary controls that prevent the misuse of data (e.g., unauthorized browsing) by those who have data access: (1) Data Encryption and (2) NARA Information Technology (IT) Policy. NARA's IT Policy is described in Section 4.b below.

a. **Data Encryption:** The most sensitive data in the NARA Online Ordering System are user passwords and user credit card numbers. These data are encrypted as they are created in the system. This data encryption control ensures that those accessing the NARA Online Ordering System data cannot decipher this sensitive information.

b. **NARA IT Policy:** NARA IT Policy is formal guidance that establishes the rules of procedure for the development, implementation, and maintenance of IT systems. This policy includes several components, such as:

    i. **NARA Directives, Supplements, and Interim Guidance** - includes policy guidance such as the Information Technology (IT) Systems Security directive (NARA 804) and its related IT security handbooks that stipulate Management Controls, Operations Controls, Technical Controls, and IT Security Web Page Controls related to NARA systems, support staff, and contractors. Also, NARA 807, Content Rules and Requirements for NARA Public Web Sites (Internet and NARA-Hosted Extranets).

    For example, the policy guidance requires that all system users complete the appropriate NARA Security Awareness Course training on an annual basis, which includes rules of behavior and consequences for violating the rules. It ensures that NARA maintains an effective incident handling capability (including intrusion detection monitoring and audit log reviews) and that each project adheres to the prescribed incident handling procedures. Additionally, background investigations are conducted on all NARA IT staff and contractors.

    ii. **Certification and Accreditation** – this process, which is conducted annually, or as major changes are implemented, to verify compliance with NARA's IT policies and controls.

    iii. **Inspector General (IG) Audits** – periodically, the IG will conduct an independent audit to review compliance with NARA internal guidelines, external guidelines (e.g., NIST), and program-level procedures and controls.

5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed? Yes, contractors involved with the design and development of the system are involved with the maintenance of the system. Appropriate Privacy Act contract clauses were inserted in their contracts, and other regulatory measures were addressed.

6. Do other NARA systems provide, receive or share data in the system? If yes, list the system and describe which data is shared. If no, continue to question 7. The NARA Online Ordering System passes payment information to the Order Fulfillment and Accounting System (OFAS) for payment processing. The data is transmitted via an

automated Extensible Markup Language (XML) interface that operates within NARA's secure internal network. Order status updates are sent back to the NARA Online Ordering System by OFAS to communicate order history and status information to the submitting user.

7. Have the NARA systems described in item 6 received an approved Security Certification and Privacy Impact Assessment? A security evaluation study of OFAS was last completed on May 27, 2005. A privacy impact assessment of OFAS was last completed on August 3, 2006.

8. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface? The System Administrator/owner is responsible for protecting the privacy rights of the public and employees affected by the interface. NARA's Senior Agency Official for Privacy is responsible for ensuring compliance with the privacy rights of the public and NARA employees.

9. Will other agencies share data or have access to the data in this system (Federal, State, Local, or Other)? If so list the agency and the official responsible for proper use of the data, and explain how the data will be used. No other agency will share data or have access to data in the NARA Online Ordering System.

Section 5: Opportunities for Individuals to Decline Providing Information

1. 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 can individuals grant consent? Online forms used by the NARA Online Ordering System to collect information for processing an order alert the individual of the information that is required and the statutory authority for collecting the information.

2. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action? Not applicable.

Section 6: Security of Collected Information

1. How will data be verified for accuracy, timeliness, and completeness? What steps or procedures are taken to ensure the data is current? Name the document that outlines these procedures (e.g., data models, etc.). The NARA Online Ordering System is a Siebel software application that has built-in controls for data integrity. The accuracy, completeness, and validity of the data is ensured by the software, NARA's extensive test of the application prior to its release into production (following NARA's Systems Development Lifecycle and Configuration Management guidelines), and the NARA Online Ordering System Administrator. Through rules established by NARA's

Chief Information Security Officer, the Systems Administrator has implemented security controls to ensure the integrity of the NARA Online Ordering System data. These controls are evaluated annually as a part of NARA's Certification and Accreditation and Program Self-Audit. The NARA Online Ordering System Program Manager is responsible for the overall integrity of the system's data. The following also ensures the integrity of the NARA Online Ordering System

a. **Documentation of Data Elements:** Conceptual and logical data models for the NARA Online Ordering System are documented in the latest release version of the Detailed Design Document and the Version Description Document. These data models, in addition to the physical data model, are maintained in NARA's System Architect modeling tool and configuration management system. All data models were approved by NARA's Data Architect and Data Administrator.

b. **Configuration Management:** The NARA Online Ordering System production baseline and all subsequent changes (e.g., application, data, infrastructure) are maintained using NARA's configuration management (CM) guidelines, as stated in NARA's Systems Development Lifecycle directive (NARA 805) and supplements to this directive: NARA Information Technology Systems Development Guidelines and Information Technology Systems Development Lifecycle Handbook.

   The CM process and supporting tools ensure that planned modifications to the NARA Online Ordering System are fully documented, tested, and approved by relevant business and technical stakeholders. The CM Plan and PVCS system are used to support this process.

c. **Service Continuity:** Continuity testing is preformed on the NARA Online Ordering System to ensure that, when unexpected events occur, the critical operations will continue without interruption or will be promptly resumed without impact to critical and sensitive data. Critical system components are tested automatically via scripts every 30 minutes.

d. **Certification and Accreditation:** Certification and Accreditation (C&A) evaluations are conducted on an annual basis, or as major changes are implemented, to reevaluate the NARA Online Ordering System and operational environment as major changes are implemented. A security evaluation study of the NARA Online Ordering System was last completed on August 31, 2005 in accordance with NIST 800-37, "Guidelines for Computer Security Certification and Accreditation."

e. **Program Self-Audit:** Annually, the Chief Information Security Officer initiates a self-audit to ensure compliance with relevant external policy and requirements, internal NARA policy and requirements, and NARA Online Ordering System procedures. The NARA Chief Information Security Officer and other relevant

staff support the effort to proactively assess compliance and address any identified gaps or issues.

2. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites? The NARA Online Ordering System is operated at one site, and its data is centrally stored at that site which is located in NARA's College Park, MD facility.

3. What are the retention periods of data in this system? NARA Files Maintenance and Records Disposition Manual (FILES 203, Appendix 18, File Number 1807) establishes the data retention schedule for the NARA Online Ordering System In accordance with FILES 203, "documents accumulated by the Trust Fund to record requests from NARA, other Government agencies, and the public for reproduction services or publications of records and other historical documents" (including service orders and related records), should be cut-off after completion of the order and destroyed when one year old. Other records should be destroyed when superseded or obsolete.

The FILES 203 guidance has been implemented according to the following technical specification. Every twelve months, in compliance with FILES 203, 1807-1, a scheduled business service purges the completed order data from the system and permanently destroys it.

For customers who voluntarily choose to store their profile information (e.g., shipping address, billing address, credit card data) in the NARA Online Ordering System for later retrieval, the profile information will remain active in the system until the customer deletes the information using the NARA Online Ordering System or contacts NARA with a request that corresponding data should be deleted. Therefore, in accordance with FILES 203, 1807-3, the NARA Online Ordering System will not expire or inactivate any customer accounts or account profile information unless the customer initiates the deletion action.

4. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented? Cite the disposition instructions for records that have an approved records disposition in accordance with, FILES 203. If the records are unscheduled that cannot be destroyed or purged until the schedule is approved. See question 3, above.

5. Is the system using technologies in ways that the Agency has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)? If yes, describe. The system incorporates e-commerce functionality that enables users to order and pay for certain NARA products and services in a self-service environment. Previously, NARA customers only had the option of submitting written order requests that contained credit card payment information (or checks). NARA personnel would key the order request and the mode of payment into OFAS for order and payment processing.

6. How does the use of this technology affect public/employee privacy? The user of e-commerce technology only automates the customer's ability to submit and pay for NARA products and services. The same data is collected, stored, and administered in a manner that fully protects the user's privacy.

7. Does the system meet both NARA's IT security requirements as well as the procedures required by federal law and policy? As outlined in par. 1d above, a security evaluation study of the NARA Online Ordering System was last completed on August 31, 2005 in accordance with NIST 800-37, "Guidelines for Computer Security Certification and Accreditation."

8. Has a risk assessment been performed for this system? If so, and risks were identified, what controls or procedures were enacted to safeguard the information? As outlined in par. 1e above, the Chief Information Security Officer initiates a self-assessment to ensure compliance with relevant external policy and requirements, internal NARA policy and requirements, and NARA Online Ordering System procedures. The FIPS 199 rating relating to confidentiality, integrity, and availability for the NARA Online Ordering System is low.

9. Describe any monitoring, testing, or evaluating done on this system to ensure continued security of information. As outlined in par. 1c thru e above, Continuity testing of the NARA Online Ordering System is preformed via scripts every 30 minutes; Certification and Accreditation (C&A) evaluations are conducted on an annual basis, or as major changes are implemented, to reevaluate the NARA Online Ordering System and operational environment as major changes are implemented; and the Chief Information Security Officer initiates a self-audit annually.

10. Identify a point of contact for any additional questions from users regarding the security of the system.

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Section 7: Is this a system of records covered by the Privacy Act?

1. Under which Privacy Act systems of records notice does the system operate? Provide number and name. NARA 37 is the SOR notice for Order Online!.

2. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain. In addition to the Privacy Impact Assessment, the SOR notice will be updated as the NARA Online Ordering System is modified or upgraded.

Conclusions and Analysis

1. **Did any pertinent issues arise during the drafting of this Assessment?** No.

2. **If so, what changes were made to the system/application to compensate?** N/A

Glossary of Terms

| Term	Description
Order Fulfillment and Accounting System (OFAS)	NARA's legacy system that currently supports the customer ordering process: sales and order entry, order fulfillment tracking, and payment processing. **Sales and Order Entry:** OFAS is used in many of NARA's organizational units to process "point of sale" transactions. This includes: • Office of Records Services - Washington, DC; • Office of Presidential Libraries; • Office of the Federal Register; • Office of Regional Records Services; and • National Archives Trust Fund Division. The system is also used by NARA staff and authorized contractors (located in the Washington, DC area) to enter (i.e., receive, maintain control of, and process) reproduction and merchandise orders that are received via the phone or mail. **Order Fulfillment Tracking:** NARA staff and authorized contractors use OFAS to track the processing of phone and mail orders. **Payment Processing:** OFAS bills customers for orders; maintains payment records for orders; processes order payments; and processes refunds. Additionally, OFAS routes customer refunds to the General Services Administration (GSA), which provides NARA's financial and accounting system under a cross-servicing agreement. OFAS records may include: catalogue order forms; other ordering forms; correspondence; copies of checks, money orders, credit card citations, and other remittances; invoices; and order and accounting information in the electronic system. These records may contain some or all of the following information about an individual: name, address, telephone number, record(s) or item(s) ordered, and credit card or purchase order information. OFAS records also include user profile data, reproduction order form data, transaction data, and credit card payment data transmitted from Order Online! (See description, below) via an automated XML (Extensible Markup Language) interface that operates within NARA's secure internal network.
NARA Online Ordering System	NARA's Web-based order entry system that is accessible from the Archives.gov site. The system enables customers to request, pay for, and track the status of selected NARA product and service orders that are submitted online (that is, via the Web). The system also incorporates order fulfillment functionality in NARA Online Ordering System, enabling NARA staff and authorized contractors (acting as NARA agents) to track the processing of customer orders. Only payment data is

	transferred between NARA Online Ordering System and OFAS.
	Also known as Order Online!

<u>See Attached Approval Page</u>

The Following Officials Have Approved this PIA
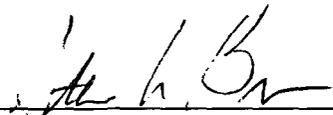
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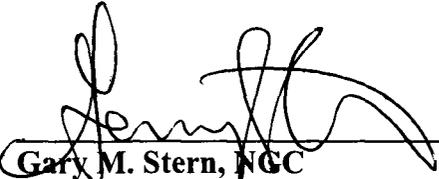
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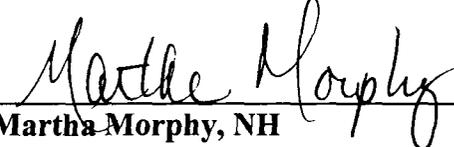
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