

Privacy Impact Assessment for the

Correspondence Tracking Management

System

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

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<u>Contact Point</u> Sally Brown, CU, Office of the Director 202-927-8245

Reviewing Official Jane C. Horvath, Chief Privacy Officer and Civil Liberties Officer Department of Justice (202) 514-0049

Introduction

ATF Correspondence Unit/Executive Secretariat

A component of the ATF Director's office, the Correspondence Unit, also known as the Executive Secretariat, is responsible for assigning, tracking, editing, reviewing, making corrections to, and preparing responses to letters ATF receives. The Unit, under the auspices of the Bureau, uses the "Correspond" system to facilitate this work. Information in the Correspond system includes the name, address, inquiry/letter content, and the outgoing ATF reply associated with inquiries and requests that ATF receives.

Section 1.0 The System and the Information Collected and Stored within the System.

Capitol Correspond is correspondence tracking and management software used for casework and correspondence. This information comes from different sources. See details below.

Casework is defined as any constituent activity that requires more than a simple one-time exchange of correspondence (i.e., one incoming letter and one response). Casework at ATF is primarily related to members of either U.S. House of Representatives or U.S. Senate and involves correspondence referred to ATF by members of the House or Senate. "Constituents," when using Capitol Correspond at ATF, are the members of the House and Senate. This type of correspondence is also referred to as "Congressionals." ATF-specific Casework involves commendations and condolences, including condolences for police and agents who have died in the line of duty.

Correspondence at ATF is defined as letters written by the Director and letters sent directly to ATF from the general public. No members of Congress are involved. A Correspondence item consists of one incoming letter and the response to the letter.

1.1 What information is to be collected?

The information collected is the name, subject, and address, of the incoming letter, Then the letter is assigned to a member of the correspondence unit to prepare the reply The outgoing reply is also saved in the system. Incoming letters to ATF are from members of the public, Senators, and Congress.

The functional system is organized into folders:

Green folder is for the Director's correspondence. This folder is not shared outside of the Director's office.

Red folder contains congressional. Items come from U.S. House of Representatives or U.S. Senate and information is shared within the ATF among the Directorates.

Black folder contains congressional or other inquiries coming exclusively from Main DOJ

1.2 From whom is the information collected?

The information is taken from the incoming correspondents' letters.

Section 2.0 The Purpose of the System and the Information Collected and Stored within the System.

Capitol Correspond is a correspondence management system that combines correspondence tracking with imaging document management and workflow.

2.1 Why is the information being collected?

The information is collected so that all incoming ATF letters can be assigned and tracked for response.

2.2 What specific legal authorities, arrangements, and/or agreements authorize the collection of information?

ATF responds to letters and information requests it receives.

2.3 <u>Privacy Impact Analysis</u>: Given the amount and type of information collected, as well as the purpose, discuss what privacy risks were identified and how they were mitigated.

Information is for internal use and available to ATF staff only. System contains sensitive but unclassified information. No privacy risk were identified. You must have rights to gain access to system.

Section 3.0 Uses of the System and the Information.

System is used to manage and track correspondence.

3.1 Describe all uses of the information.

The information collected is used to respond to the letters and inquiries the agency receives from external sources.

3.2 Does the system analyze data to assist users in identifying previously unknown areas of note, concern, or pattern? (Sometimes referred to as data mining.)

No.

3.3 How will the information collected from individuals or derived from the system, including the system itself be checked for accuracy?

If reply is improperly addressed, the Postal Service will return it to the Unit as "undeliverable."

If input is questionable or unclear the system owner is notified and contact is made with the initiator. All outputs including response to correspondence are validated before delivery.

3.4 What is the retention period for the data in the system? Has the applicable retention schedule been approved by the National Archives and Records Administration (NARA)?

Per Document Services Branch, retention schedule will be drafted in July. Document Services Branch has some guidance coming from the National Archives & Records Administration (NARA) on potential retention periods for the records inputted and housed in Capitol Correspond that involve Senior level employees.

3.5 <u>Privacy Impact Analysis</u>: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Access to the system is limited to office users only. You must have the software installed on your machine to gain acces.

Section 4.0 Internal Sharing and Disclosure of Information within the System.

The following questions are intended to define the scope of sharing both within the Department of Justice and with other recipients.

4.1 With which internal components of the Department is the information shared?

Red and Black folders are shared within ATF Directorates.

4.2 For each recipient component or office, what information is shared and for what purpose?

All share the same type of incoming correspondence.

4.3 How is the information transmitted or disclosed?

Information is routed by folder. Eventually information will be routed by workflow using e-mail.

4.4 <u>Privacy Impact Analysis</u>: Given the internal sharing, discuss what privacy risks were identified and how they were mitigated.

Information is for internal use only and is being evaluated for privacy risk.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to DOJ which includes foreign, Federal, state and local government, and the private sector.

5.1 With which external (non-DOJ) recipient(s) is the information shared?

N/A

5.2 What information is shared and for what purpose?

N/A

5.3 How is the information transmitted or disclosed?

N/A

5.4 Are there any agreements concerning the security and privacy of the data once it is shared?

N/A

5.5 What type of training is required for users from agencies outside DOJ prior to receiving access to the information?

N/A

5.6 Are there any provisions in place for auditing the recipients' use of the information?

N/A

5.7 <u>Privacy Impact Analysis</u>: Given the external sharing, what privacy risks were identified and describe how they were mitigated.

N/A

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the opportunity to consent to uses of said information, and the opportunity to decline to provide information.

6.1 Was any form of notice provided to the individual prior to collection of information? If yes, please provide a copy of the notice as an appendix. (A notice may include a posted privacy policy, a Privacy Act notice on forms, or a system of records notice published in the Federal Register Notice.) If notice was not provided, why not?

By writing to ATF with questions or concerns, it is implied that the person making the inquiry expects a response, and that ATF will respond.

6.2 Do individuals have an opportunity and/or right to decline to provide information?

N/A

6.3 Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?

N/A

6.4 <u>Privacy Impact Analysis</u>: Given the notice provided to individuals above, describe what privacy risks were identified and how you mitigated them.

N/A

Section 7.0 Individual Access and Redress

The following questions concern an individual's ability to ensure the accuracy of the information collected about him/her.

7.1 What are the procedures which allow individuals the opportunity to seek access to or redress of their own information?

N/A

7.2 How are individuals notified of the procedures for seeking access to or amendment of their information?

N/A

7.3 If no opportunity to seek amendment is provided, are any other redress alternatives available to the individual?

N/A

7.4 <u>Privacy Impact Analysis</u>: Discuss any opportunities or procedures by which an individual can contest information contained in this system or actions taken as a result of agency reliance on information in the system.

N/A

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 Which user group(s) will have access to the system?

Correspondence Unit and a representative from each directorate.

8.2 Will contractors to the Department have access to the system? If so, please submit a copy of the contract describing their role with this PIA.

The ATF operations contractors have access to this system in terms of supporting its day to day operations, backups, disaster recovery etc. These contractors are subject to security agreements and information security training. Questions concerning the contract may be addressed to the ATF Contracts Office or Information Systems Division.

8.3 Does the system use "roles" to assign privileges to users of the system?

No

8.4 What procedures are in place to determine which users may access the system and are they documented?

System owner and supervisor must approves request for access and ATF has procedures for executing access requests to any systems. You must be issued a user id and password to gain access into the system.

8.5 How are the actual assignments of roles and rules verified according to established security and auditing procedures?

From database perspective this is not a role base system.

8.6 What auditing measures and technical safeguards are in place to prevent misuse of data?

Database access is audited on a daily basis.

8.7 Describe what privacy training is provided to users either generally or specifically relevant to the functionality of the program or system?

Employees are instructed on privacy issues during training prior to gaining access to the system. Employees are also required to complete information security training every year. This course is a refresher to remind employees to ATF's strict guidelines on computer security and privacy issues.

8.8 Is the data secured in accordance with FISMA requirements? If yes, when was Certification & Accreditation last completed?

Yes, C & A was last completed on September 24, 2003. In addition, a new C & A is on schedule and is currently in progress.

8.9 <u>Privacy Impact Analysis</u>: Given access and security controls, what privacy risks were identified and describe how they were mitigated.

System is in progress of reviewing privacy risk.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, RFID, biometrics and other technology.

9.1 Were competing technologies evaluated to assess and compare their ability to effectively achieve system goals?

No

9.2 Describe how data integrity, privacy, and security were analyzed as part of the decisions made for your system.

"Off the shelf" system was purchased more than 10 years ago; buyers evaluated these issues at the time.

9.3 What design choices were made to enhance privacy?

N/A

Conclusion

Persons write or contact ATF with inquiries and requests for information. Since the FOIA and the PA do not allow for answers to questions, the Correspondence Unit is the place where the public can receive a written response to their requests. These inquiries that ATF receives are not usually personal in nature, but involve questions about criminal and regulatory matters, and ATF missions, functions, responsibilities, and programs. In fulfilling its duties to respond to inquiries and requests, ATF uses Correspond to log in, scan, track, and assign incoming request.

Responsible Officials

<u>/signed/</u> Sally Brown Team Leader, Correspondence Unit Bureau of Alcohol, Tobacco, Firearms and Explosives

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Jane Horvath Chief Privacy and Civil Liberties Officer Department of Justice