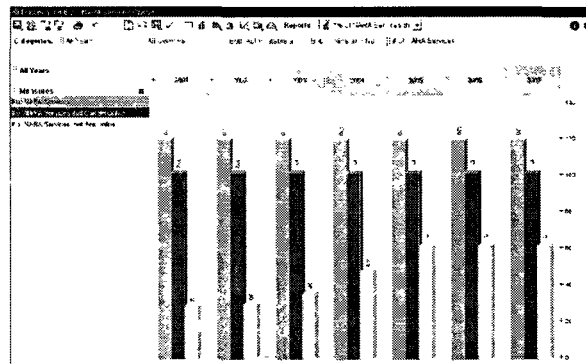Performance Measurement and Reporting System (PMRS)

Privacy Impact Assessment

August 22, 2008   Version 1.0

Prepared for

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Table of Contents

Update History

Date	Version	Description	Author
Aug 22, 2008	1 0	Initial	S Beste

Privacy Impact Assessment

Name of the Project. Performance Measurement and Reporting System

Project ID. PMRS

Legal Authority. Government Performance and Results Act, 1993, "GPRA"

Purpose of this System. GPRA provides that agencies will have strategic plans with numeric performance targets. It further provides that agencies shall report their progress against those goals with auditable figures. PMRS is the system that collects and reports those auditable performance results at NARA.

1. Overview of PMRS

1.1 A Data Warehouse

PMRS is a data warehouse application. As such, it has no data of its own. Rather, it gathers data from 71 NARA sources for the purpose of combining and publishing them through a common user interface. This is the big picture.
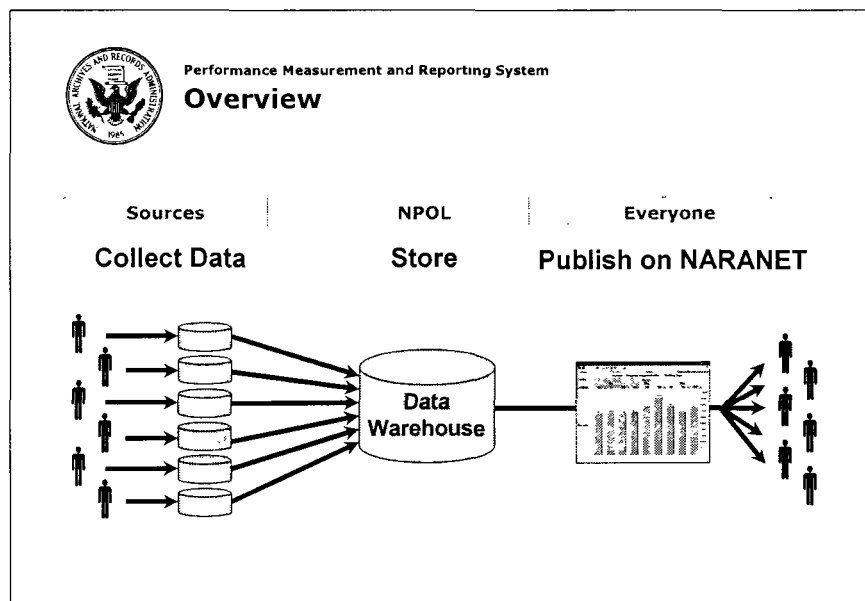
PMRS pulls hundreds of data elements from these databases each month, covering every aspect of NARA operations Most of this has nothing to do with individuals or their privacy.

1.2   Parts of PMRS Relevant to Privacy

The diagram below shows where personally-sensitive information resides in PMRS. The dark background defines the boundary of PMRS. The colors pink and green show the two categories of data at issue·

- FOIA requests and written requests – data on requests for information from the public by FOIA or otherwise.

- Employee data.

The rest of this assessment treats these two categories separately. But understand how all the data flows into and out of PMRS.

Performance Measurement and Reporting System
Flow of Personal Information through PMRS
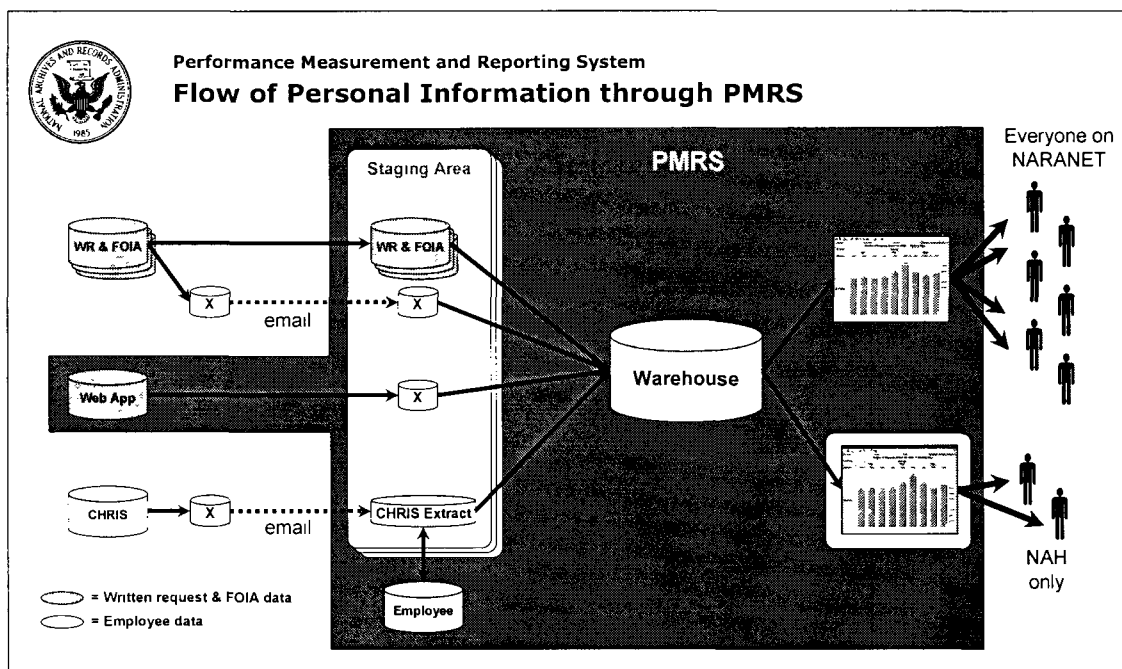
1. **People enter data into source databases** at left. Normally, source databases are the responsibility of their owners (CMRS, SOFA, CHRIS…). The privacy impacts of those systems are not covered here. We have one exception: the PMRS web application is inside the PMRS boundary. It is a source database that is also part of PMRS.

2. **Some databases are sent whole to PMRS each month.** For example, NGC sends its entire FOIA-tracking database to the PMRS staging area every month.

3. **Other systems send only extracts.** With the exception of the extract from CHRIS, these extract databases do not contain data on individuals.

4. **NPOL stages everything.** All incoming data takes the form of a file in the PMRS staging folder.

5. **NPOL keeps a copy of every submission.** For data quality and audit purposes, NPOL keeps a copy of every database it receives. It does this by saving a copy of the staging are each month.

6. **NPOL loads the warehouse.** Except for employee data, the warehouse contains no personally-identifiable information.

7. **NPOL publishes to everyone on NARANET.** This is the publication side of PMRS. It contains summary data only and no privacy data.

8. **NPOL publishes employee data to NAH.** A small amount of personally-identifiable employee data goes to selected people in NAH for use in workforce planning.

1.3   Borderline Cases Not Discussed Further

In the interest of complete disclosure. PMRS touches on two other categories of personal information.

1.3.1   Data Regarding Online Reproduction Orders

PMRS collects data on every reproduction order placed through SOFA. However, it collects only the fields below. None of these identifies the requester or the subject of the request. *Therefore, this data has no bearing on privacy and will not be discussed further.*

ORDER EXTRACT : Table

Field Name	Data Type	Description
order id	Text	A unique identifier from the OFAS system for a reproduction order.
product type cd	Text	The OFAS code for what PMRS calls an order type. Expressed as a form #: 85, 72a, etc.
nara org cd	Text	The NARA org code of the archival business unit that processed the request.
order payment type cd	Text	The method by which a reproduction order is to be paid.
order result cd	Text	Indicates whether the records ordered for reproduction have been sought and found.
receipt dt	Date/Tim	The date the order was first entered into OFAS.
completion dt	Date/Tim	The date NARA completed all work on the order.
ready for shipment dt	Date/Tim	The date the order was ready to ship. Where [order payment type cd] = 'Billed', PMRS sets [completion dt] to this value.
servicing age	Number	The number of NARA working days that the order remained in the servicing part of the work flow.
production age	Number	The number of NARA working days that the order remained in the production part of the work flow.
ready age	Number	The number of NARA working days that the order remained in the ready-for-shipment part of the work flow.

1.3.2   Employee Log-In Data

The PMRS web application is used by about 280 NARA employees   Regarding these users, the application stores.

- Their name.
- Their organization code(s).
- Their NARANET login ID.
- The date and time of their last login.
- The user ID and a timestamp of the last change made to every row of data   This information is visible to any colleague who can see that row of data.

This data is used to:

- Restrict system access to registered users
- Restrict user access to just the logs and organizations they need.
- Spot users who are inactive in the system (and who may therefore need to be dropped).
- Maintain accountability for the data by revealing who last changed it.

This information is necessary for the reasonable functioning of the system. No use is made of the data outside of the application. It is not particularly sensitive. *Therefore, this data will not be discussed further.*

2.   Employee Data

This diagram is an extract of the one on page 2. It shows just the data about employees.
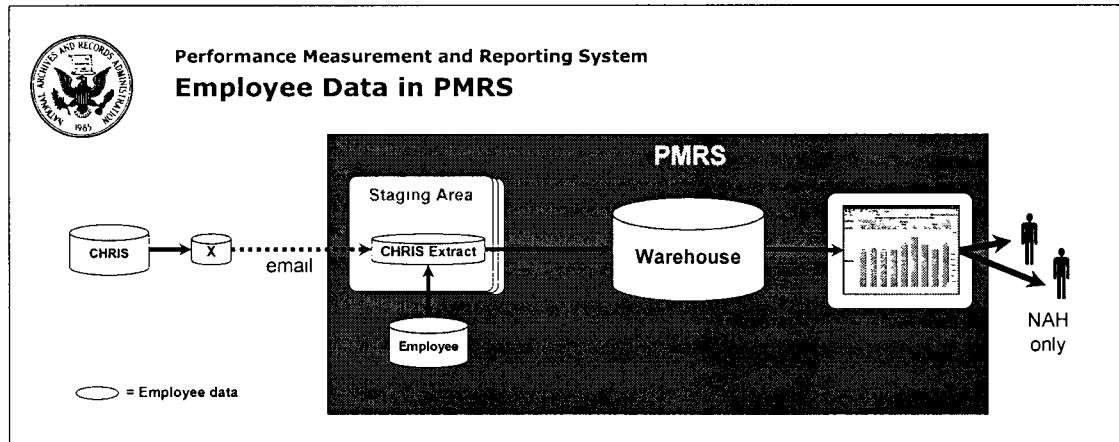
2.1   Employee Information Being Collected

Employee data enters PMRS from two sources:

*   CHRIS, the personnel system. This is the major source. Every pay period, NAHO emails NPOL an extract from CHRIS. This is shown at left in the diagram above.

*   Employee.mdb. This PMRS database is where certain people in College Park check off employees as having performance plans or individual development plans (IDPs).

2.1.1   CHRIS Extract.mdb

This is PMRS's receiving database for the extract coming from CHRIS. It has the fields on the next page. No social security numbers are used or received from CHRIS. The most sensitive fields are:

*   NARA employee number

*   Employee name

*   Birth date

*   Self-declared race code

*   Disability code.

Only the PMRS Administrator and the three office Points of Contact (in NL, NR, and NW) have permissions in the staging area where this file resides. At the end of every month, the files in the staging are zipped and transferred to the PMRS Windows server where all historical zipfiles of the staging area reside Only the PMRS Administrator has permissions to view the data there.

The database is essentially an envelope for moving the data. It has no queries for analyzing the data.

EMPLOYEE : Table

Field Name	Data Type	Description
employee num	Number	NARA's unique employee identifier Switch from SSAN when CHRIS can give us separations by employee num.
employee name	Text	Last name and first name of the employee
pay plan cd	Text	A code designating schedule of pay grades typically meaning "GS" = General Schedule
grade num	Number	Level of the position, such as the "13" in "GS-13"
occupational series cd	Text	A code describing the kind of duties to which the employee has been assigned
supervisory level cd	Text	A code indicating the employee's supervisory role
nara org cd	Text	Org Code from PIRS
facility cd	Text	The duty city code from CHRIS, the personnel system
position title txt	Text	Title of the employee's position
hire dt	Date/Time	The date the employee's tenure at NARA officially began: Dt EOD NARA
separation dt	Date/Time	The date the employee's tenure at NARA officially ended: Dt Separated
separation reason cd	Text	From the personnel system, a code for the reason an employee left NARA.
appt type cd	Text	A code indicating the rule under which the employee holds his position
disability cd	Text	A code indicating the most severe disability claimed by the employee
	Text	A code indicating the employee's sex
race combo cd	Text	A code of 1s and zeroes in which each of 6 digits indicates membership in a particular race.
patcob cd	Text	A code indicating whether the person's position is professional, clerical, blue collar, etc
appt auth cd	Text	3 digit code that identifies an appointment authority
work schedule cd	Text	A code that distinguishes between full-time, part-time, intermittent, and seasonal employment.
retirement eligibility dt	Date/Time	The earliest data that this employee will be eligible to retire
birth dt	Date/Time	The employee's birth date.
federal service start dt	Date/Time	SCD (leave) in CHRIS This is the date to use for calculating years of Federal service. It's a virtual date since if there are gaps in service, th
last promotion dt	Date/Time	The date of the employee's last promotion. If none, then [hire dt].
retirement plan cd	Text	The code that indicates which retirement plan applies to this employee.
target grade num	Number	The top grade level of the employee's current career track
record status txt	Text	Status of the record as a result of the last update from the personnel system
idp flg	Yes/No	Yes=This employee has a Individual Development Plan approved as being linked to strategic goals
idp dt	Date/Time	The date on which the employee's Individual Development Plan was approved as being linked to strategic goals
end of month idp dt	Date/Time	As of end of last quarter .The date on which the employee's Individual Development Plan was approved as being linked to strategic goals
performance plan flg	Yes/No	Yes=This employee has a current performance appraisal plan approved as being linked to strategic goals
performance plan dt	Date/Time	The date on which the employee's performance appraisal plan was approved as being linked to strategic goals
end of month performance pl	Date/Time	As of end of last quarter . The date on which the employee's performance appraisal plan was approved as being linked to strategic goals
new nara org cd	Text	Manually entered by the PMRS Administrator during times of reorganization when people have both old & new codes. Suppresses cancellatio
cancel idp flg	Yes/No	Temp data. Yes = Cancel the person's IDP in Employee.mdb Incoming data shows a change in org, position, or grade
cancel performance plan flg	Yes/No	Temp data. Yes = Cancel the person's performance plan in Employee.mdb. Incoming data shows a change in org, position, or grade.

2.1.2   Employee.mdb

This is the Access database where the offices check off people as having performance plans and individual development plans. It contains the minimum number of fields to support that function. The list of employees gets updated by CHRIS Extract.mdb every time it imports new data from CHRIS.

The database resides in a Netware folder where permissions are limited to the 26 people designated by their offices to do this work.

Beyond the confluence of employee name and number, this database has no sensitive data.

EMPLOYEE ON N : Table

Field Name	Data Type	Description
employee num	Number	NARA's unique employee identifier. Switch from SSAN when CHRIS can give us separations by employee num.
employee name	Text	Last name and first name of the employee
nara org cd	Text	Org Code from PIRS
hire dt	Date/Time	The date the employee's tenure at NARA officially began, Dt EOD NARA
appt type cd	Text	A code indicating the rule under which the employee holds his position
appt auth cd	Text	3 digit code that identifies an appointment authority
work schedule cd	Text	A code that distinguishes between full-time, part-time, intermittent, and seasonal employment
idp flg	Yes/No	Yes=This employee has a Individual Development Plan approved as being linked to strategic goals
idp dt	Date/Time	The date on which the employee's Individual Development Plan was approved as being linked to strategic goals
end of month idp dt	Date/Time	As of end of last quarter The date on which the employee's Individual Development Plan was approved as being linked to strategic goals
performance plan flg	Yes/No	Yes=This employee has a current performance appraisal plan approved as being linked to strategic goals
performance plan dt	Date/Time	The date on which the employee's performance appraisal plan was approved as being linked to strategic goals
end of month performance pl	Date/Time	As of end of last quarter. The date on which the employee's performance appraisal plan was approved as being linked to strategic goals

2.1.3   PMRS Warehouse

This is the heart of PMRS. It stores data on all employees, present and past, with monthly snapshots of various properties, such as their current grade and position title.

The database resides in SQL Server running on the PMRSprod Windows server. Access is restricted to the PMRS Administrator.

This is **EMPLOYEE**, the parent table, with one row for every employee past and present. Sensitive fields are:

- NARA employee number

- Employee name

- Birth date

EMPLOYEE : Table			
Field Name	Data Type	Description	
employee num	Number	The unique identifier for every NARA employee. Negative numbers represent summary data prior to FY2003, before data on individuals was st	
employee name	Text	The name of the employee, last name first, as in Smith, Jr., Steven S	
hire dt	Date/Time	The date the person began work at NARA for the most recent time.	
separation dt	Date/Time	The date the employee left NARA employment. Null if still employed.	
retirement eligibility dt	Date/Time	The date on which this employee will be (or was) eligible to retire This is known as "Compute Optional Retirement" in the Business Objects inter	
separation reason cd	Text	From the personnel system, a code for the reason an employee left NARA.	
birth dt	Date/Time	The employee's birth date.	
federal service start dt	Text	The date on which the employee's time in Federal service can be calculated This is "Service Computation Date (for leave)" in the Business Obje	
retirement plan cd	Text	A code indicating the retirement plan that covers this employee.	
last active duty month end dt	Date/Time	Calculated = the last month that this employee was on active duty. Useful for pulling his last grade, org, occupational series, and so on.	

This is **EMPLOYEE SNAPSHOT**, the child table, with one row for every active employee each month. Sensitive fields are:

- NARA employee number

- Self-declared race code

- Disability code.

EMPLOYEE SNAPSHOT : Table		
Field Name	Data Type	Description
month end dt	Date/Time	The last day of the month covered by the data
employee num	Number	The unique identifier for every NARA employee. Negative numbers represent summary data prior to FY2003, before data on individuals was st
nara org cd	Text	Correspondence code of the organization covered by the data.
facility cd	Text	The duty city name from the personnel system
pay plan cd	Text	A code designating schedule of pay grades typically meaning "GS" = General Schedule
grade num	Number	Level of the position, such as the "13" in "GS-13"
occupational series cd	Text	A code describing the kind of duties to which the employee has been assigned
supervisory level cd	Text	A code indicating the employee's supervisory role
appointment type cd	Text	A code indicating the rule under which the employee holds his position
appointing authority cd	Text	From OPM rules - the authority that governs the appointment of a person to a position.
disability cd	Text	A code indicating the most severe disability claimed by the employee
sex cd	Text	A code indicating the employee's sex
race combo cd	Text	A code indicating membership in a particular combination of races.
collar cd	Text	A code indicating whether the person's position is professional, clerical, blue collar, etc
work schedule cd	Text	A code that distinguishes between full-time, part-time, intermittent, and seasonal employment.
target grade num	Number	The top grade in the employees current career track.
last promotion dt	Date/Time	The date of the employee's last promotion. Set to [hire dt] if no promotion Used for calculating time in grade.
employee qty	Number	The number of current employees as of the end of the month.
performance plan qty	Number	The number of current employees with current performance appraisal plans approved as being linked to strategic goals
individual development plan c	Number	The number of current employees who have development plans aligned with strategic goals.

2.1.4 NAH Databeacon Web Site

PMRS publishes its data on NARANET using Databeacon. Databeacon is an easy-to-learn tool for slicing and dicing numerical data using a web browser. Our standard Employee "cube" lets users slice the data on 12 dimensions, such as pay plan, grade, supervisory level, org code, gender, race, or any combination of these. The system does not let users ask about individuals. Indeed, neither employee names nor numbers are on the web site. However, by slicing the data fine enough, users can sometimes tell who the data is describing, especially in small units where there may be only one female GS-9 Archives Technician. Therefore, when NAH asked for more dimensions – in particular, a breakout by peoples' ages – we knew that we had a privacy issue.

Our solution was to give NAH the additional dimensions they want, but to put that data at a hidden location on the PMRS web site. The data is accessible by anyone on NARANET, but only if they know the URL. Databeacon has no security facilities of its own.

The sensitive data here is peoples' ages and the possibility that users could connect an age with a specific employee by qualifying all the other dimensions enough as described above.

hr_employee

The main cube, hr_employee, has two measures that can be broken out in 19 dimensions (right) The data covers monthly snapshots of active employees.

hr_employee_retention

This cube (below) shows the same 19 dimensions as the main cube, but it focuses on employee retention.

hr_employee_retiree_retention

This last cube (right) includes the same 19 dimensions as the others, but focuses on how long retirement-eligible employees have historically continued to work at NARA.

2.2   Why the Employee Information is Being Collected

2.2.1   Is each data element required for the business purpose of the system? Explain.

The list of data elements is driven by the needs of NAH to do workforce planning. In particular:

- Retention analysis requires that PMRS keep data on individuals. We need to see if the specific people who were here last year are still here.

- The analysis by age requires peoples' birth dates. Knowing peoples' ages is a reasonable part of workforce planning and analysis

In addition, NPOL has its own requirements for metrics.

- The Strategic Plan says that we will measure how many of our employees have performance plans linked to the Strategic Plan, as well as how many have individual development plans.

- A breakout of data by race, gender, and disabilities is required for our reporting to OMB.

2.2.2   Is there another source for the data? Explain how that source is or is not used?

CHRIS is the only source of this data.

2.3   Intended Use of this Information

2.3.1   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?

No. PMRS offers no more data about individuals than is already in CHRIS – except for the fact of whether they have a performance plan or IDP.

2.3.2   Will the new data be placed in the individual's record?

No. There is no new data.

2.3.3   Can the system make determinations about employees/the public that would not be possible without the new data?

No. There is no new data.

2.3.4   How will the new data be verified for relevance and accuracy?

There is no new data

2.3.5   If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

See the descriptions in section 2.1 above regarding the access restrictions on the various data stores.

2.3.6   If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

See descriptions in section 2.1 above regarding the access restrictions on the various data stores. In addition, PMRS has extensive data quality checks to ensure the integrity of the data as it moves into the warehouse. If NAHO adds a new code, if NPOL changes an org code, even if NAHO assigns a new number to someone – these conditions are all caught by the import code.

2.3.7   Generally, how will the data be retrieved by the user?

Essentially, PMRS is a reporting tool offering summary data. Except for the administrator, the data is *not* retrievable by the user. Instead, PMRS delivers summary data through its web site.

2.3.8   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.

Except for the administrator writing ad hoc queries, the data is not retrievable by a personal identifier.

2.3.9   What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

None.

2.3.10   Can the use of the system allow NARA to treat the public, employees or other persons differently? If yes, explain.

No   PMRS will not allow NARA to treat individuals differently. Hopefully, it will help us be smarter about treating classes of individuals differently through the mechanism of workforce planning.

2.3.11   Will this system be used to identify, locate, and monitor individuals?

Not at all.

2.3.12   What kinds of information are collected as a function of the monitoring of individuals?

None.

2.3.13   What controls will be used to prevent unauthorized monitoring?

N/A.

2.3.14   If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?

Yes. As noted above, the web application requires its users to log in. It then tracks the changes they make. On the publication side, Databeacon creates cookies based on the IP address of the user's machine It uses these to connect returning users with views of the data that they have saved. It has no capability to track usage. In any event, the only web users are government employees and contractors doing government work.

2.4   Sharing of Collected Information

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

See the descriptions of the various data stores in section 2.1 on page 4 above.

2.4.2   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 access rules are simple and herewith documented.:

- The PMRS administrator (and presumably ITSS support staff) has access to everything in PMRS.

- Everyone on NARANET has access to the published data.

- NAH and the people they share the URL with have access to the web site that publishes summary employee data by age.

- Access to Employee.mdb is open to anyone in College Park whose central-office supervisor designates as the person for checking off performance plans and IDPs.

- Access to the web logs is open to anyone on NARANET whose supervisor sends an email making the request to the PMRS Administrator

2.4.3   Will users have access to all data on the system or will the user's access be restricted? Explain.

See the descriptions in section 2.1 on page 4 above regarding restrictions applied to the various data stores.

2.4.4   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)?

The PMRS Administrator is the only person with access to sensitive details. His training in privacy requirements consists of the standard NARA online course plus the preparation of this PIA.

2.4.5   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?

Contractors are very much involved in the creation and operation of PMRS. However, PMRS is not a Privacy Act system of record, so there is no requirement for contract clauses.

2.4.6   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.

PMRS is all about sharing data   The source of employee data is CHRIS.

2.4.7   Have the NARA systems described in item 6 received an approved Security Certification and Privacy Impact Assessment?

CHRIS is an approved Privacy Act system.

2.4.8   Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

NPOL is responsible for controlling access to information in PMRS.

NAH is responsible for limiting the contents of the extract sent to PMRS from CHRIS.

2.4.9   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. PMRS is an internal NARA system.

2.5   Opportunities for Individuals to Decline Providing Information

2.5.1   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?

Individuals have no right to decline the uses documented here.

2.5.2   Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?

N/A. PMRS is a reporting system. It reports statistics after the fact. It is not involved in any determinations, certainly none regarding individuals.

2.6   Security of Collected Information

2.6.1   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 data is refreshed every pay period with new data from CHRIS Thus, the current data is always as authoritative as it can be.

The program that imports the data from CHRIS makes sure that all employees previously reported are accounted for in the new extract, either as current employees or as separated employees. It also spots people who have had their NARA employee number changed.

2.6.2   If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

N/A. The system is used at only one site.

2.6.3   What are the retention periods of data in this system?

- **Data warehouse**: Ten years, per the PMRS records schedule, N1-064-03-1.

- **Employee.mdb**: N/A   This database does not retain historical data. It stores only a current snapshot of active employees from CHRIS. Separated employees are removed as part of the update from CHRIS.

- **CHRIS Extract.mdb**. This likewise contains only the contents of the latest update from CHRIS.

- **PMRS web site**: The data on this site is replaced each month with new data.

- **Historical copies** of the staging area: Kept for 3 years, per the PMRS records schedule, N1-064-03-1.

2.6.4   What are the procedures for disposition of the data at the end of the retention period?

- **Data warehouse**: Destruction is done automatically by a SQL Server scheduled job that runs every October.

- **Historical coppies** of the staging area: Destruction is done manually by the PMRS Administrator every October

2.6.5   Is the system using technologies in ways that the Agency has not previously?

No.

2.6.6   How does the use of this technology affect public/employee privacy?

N/A. No such technology is used.

2.6.7   Does the system meet both NARA's IT security requirements as well as the procedures required by federal law and policy?

Yes. PMRS has NARA C&A approval.

2.6.8   Has a risk assessment been performed for this system?

Yes

2.6.9   Describe any monitoring, testing, or evaluating done on this system to ensure continued security of information

- The units regularly view their performance on the PMRS web site. They complain if they find something amiss in the data.

- PMRS has extensive validation checks to ensure that data being imported is clean and complete.

- ITSS keeps backup copies for 90 days of all data in PMRS.

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

Steve Beste, NPOL   301-837-0918.

3.   Written Requests & FOIAs in the Unit Logs

This diagram is an extract of the one on page 2. It shows just the data about written requests and FOIAs. Data flows from the source systems on the left to the website users on the right.
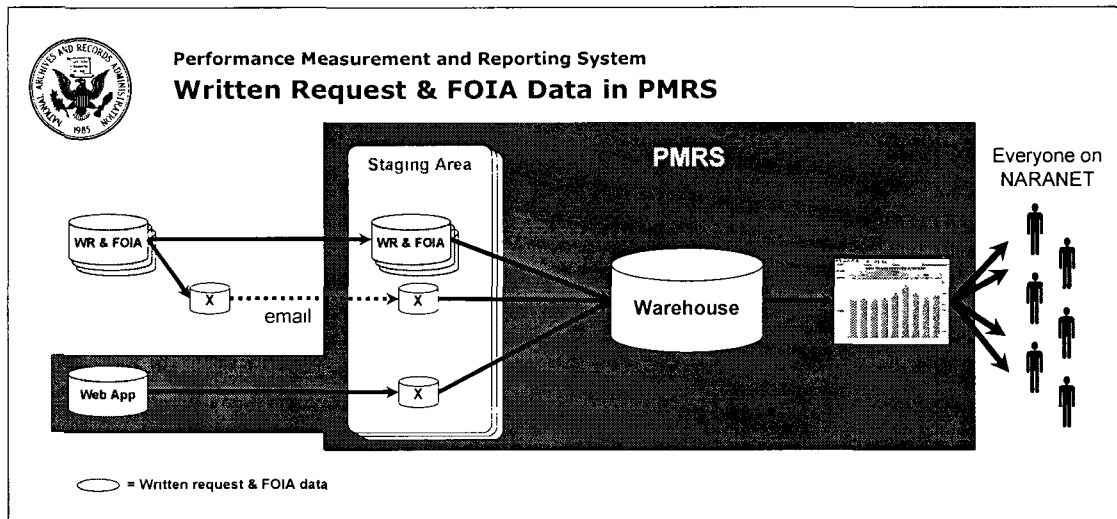
NARA's customer service standards say that if you write to us requesting information, we will reply within ten working days Likewise, if you send us a request and cite the Freedom of Information Act (FOIA), we will reply within 20 working days. PMRS measures and publishes this performance.

To do so. PMRS collects data on every FOIA request and every "written request". However, PMRS does not need to know anything about the requesters or the specifics of the requests Therefore, the warehouse itself does not contain any such fields. *The warehouse is not discussed further*.

The units who reply to the requests obviously <u>do</u> need to know the requester and the specifics of their requests. Almost every unit in NARA therefore has a correspondence log of some kind and also a FOIA log. Sometimes, the two logs are combined in one database, sometimes not. In FY2004, PMRS replaced many of these local logs with the PMRS web application. This includes both a FOIA log and a written request log. Units were free to switch to the web app logs or to continue on as they were. This produced the two kinds of sources shown at the left in the diagram above: Local databases and the PMRS web app.

For those units that kept their own logs, two reporting mechanisms emerged. Some, such as NGC, simply email a copy of the entire log to the PMRS Administrator each month. This is simple, and 17 units take this approach. Other units (18) create an extract database and send only that. This is a little more work for the unit each month, but it's appropriate where the source database is large. The Bush and Clinton libraries, for instance, both have large, complicated logs that cover FOIAs, written requests, and many other management functions. They send extracts.

These extracts contain no personally-identifiable data. *The extracts are not discussed further*.

The topics of interest are thus.

- The copies of the unit logs that arrive in PMRS, and
- The web application. That is covered in section 4 on page 16 below.

3.1   Written Request and FOIA Information Being Collected in the Unit Logs

Every month, PMRS receives 14 databases containing written request details, 2 containing FOIA details, and one containing both for a total of 17 databases of interest here. The sensitive fields are typically:

- The name of the person making the request (a member of the public)
- The person's address and telephone number
- A description of the records being sought.
- The date of the request and the dates of our actions in reply.

Of the 17 databases:

- 2 go to the PMRS Administrator in NPOL.
- 6 go to the PMRS point of contact in NL central office.
- 9 go to the PMRS point of contact in NR central office

All of these people save the databases to the PMRS staging area on the PMRSprod server. Access to the staging area is limited to the PMRS Administrator and the PMRS points of contact in the NL, NR, and NW central offices. As a practical matter, none of these people actually looks at the data unless there's a problem. The act of saving the file in the staging area launches the PMRS warehouse loader. It extracts the fields relevant to timeliness and leaves the sensitive fields behind.

On the first of every month, the contents of the staging area are zipped and saved to a folder on the PMRSweb server accessible only by the PMRS Administrator. The staging area is then emptied, ready for the next month. This is an automatic process.

3.2   Why the Written Request and FOIA Information is Being Collected

The sensitive information arrives as a byproduct of collecting other data in these logs. PMRS makes no use of it and does not import it into the PMRS warehouse.

The alternative would be to have the units send in only extracts of their logs. Some units do this already The question is whether it makes business sense to expand that design to all units. The tradeoffs are these:

- The cost of building, deploying, teaching, and maintaining 17 extract databases. These are small units with limited technical ability. NPOL would have to do the work.
- The additional complexity of the monthly submission step at each unit.
- The limited sensitivity of the data.
- The very limited additional exposure that the present system incurs.
- The value to the public in having NARA track the timeliness of our replies to these requests at reasonable cost.

Given the tradeoffs, NPOL concludes that the present design is appropriate.

3.3   Intended Use of this Information

None.

3.4   Sharing of Collected Information

The data is not shared. It goes nowhere, as describe in the introduction to this section 3 on page 13 above

3.5   Opportunities for Individuals to Decline Providing Information

None.

3.6   Security of Collected Information

The files in question reside, in sequence:

- As email attachments in GroupWise, protected by the recipient's password.

- In the PMRS staging area. Access to that requires first a NARANET login and then an account on the PMRSprod server. Very few people have this. See section 3.1 on page 14 above.

- In the PMRS staging area archive. Access to this requires first a NARANET login and then an account on the PMRSweb server. Only the PMRS Administrator has this.

4.   Written Requests & FOIAs in the PMRS Web Application

This diagram is an extract of the one on page 2. It shows just the data about written requests and FOIAs.
Data flows from the source systems on the left to the website users on the right.
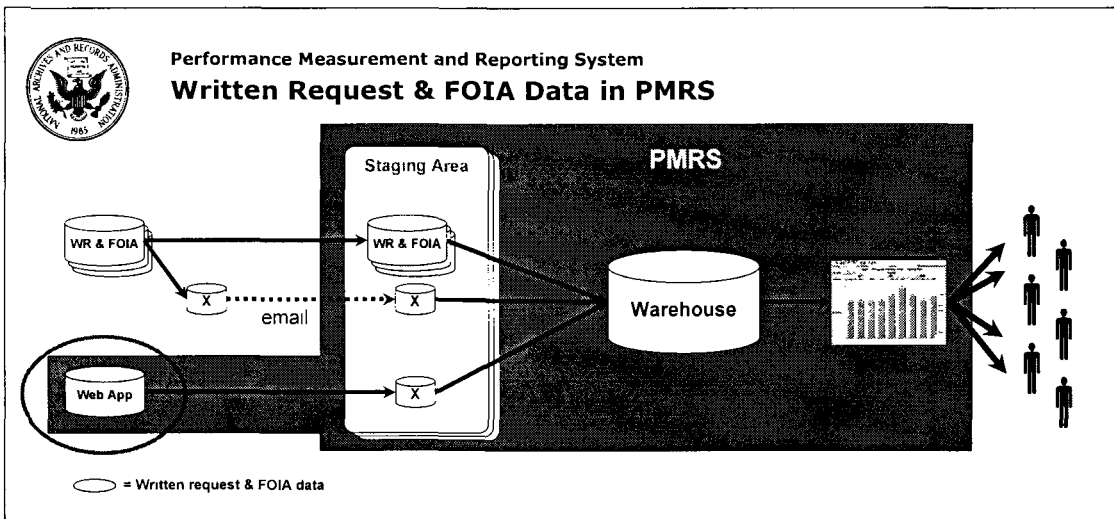
Please read the introduction to major section 3 on page 13 for an overview of written request and FOIA
data in PMRS. This section concerns the PMRS web application, its FOIA Log, and its Written Request
Log.

About the PMRS Web Application

NPOL deployed the web app in FY 2004 as a replacement for several dozen Access databases that were
then being sent in every month. The old databases were cumbersome, inflexible, and depended on people
in the field to push the data to NPOL. By contrast, the web app allows central maintenance, and NPOL
can pull the data from the database at any time. As the scope of PMRS expanded, the web app allowed
NPOL to collect additional data at relatively low cost.

The downside of the web app is that it puts NPOL in the business of owning a source system. Normally,
source databases are the responsibility of their owners (CMRS, SOFA, CHRIS, and all the little Access
databases that still come into PMRS). With the web app, NPOL is obliged to support the field units'
requirements for day-to-day management data, at least within certain subject areas. Two of those subject
areas are FOIAs and written requests.

In practice, many units chose to keep using their own databases in lieu of the web versions. This is the
current situation:

- **FOIAs**. The big FOIA shops run their own databases. NRPM uses CMRS, NWCT uses
  ADRRES, the PRA libraries and NGC use home-grown Access databases. Only the small shops
  use the FOIA web log. Of the 12,186 FOIAs received in FY2007, only 3% (360) came into
  PMRS through the FOIA web log. But these covered 20 NARA units. That is 20 Access
  databases that we no longer have to chase each month.

- **Written requests**. Units are very attached to their correspondence logs. Only 5 units out of 41
  chose to replace them with the one in the web app. The web app recorded 2,954 written requests
  in FY2007, 3% of the total excluding NRPM.

The web application currently has 281 registered users. Many of these are supervisors and backup users. 154 users are active, having logged into the system in the past three months.

4.1   Written Request and FOIA Information Being Collected in the Web Application

The sensitive fields are typically:

- The name of the person making the request (a member of the public)

- The person's address and telephone number

- A description of the records being sought.

- The date of the request and the dates of our actions in reply.

Specifically, in respect to FOIAs, the web app collects the fields at right.

In respect to written requests, the web app collects the fields below:

Web - WRITTEN REQUEST : Table

Field Name	Data Type
request num	AutoNumber
nara org cd	Text
request id	Text
medium name	Text
request receipt dt	Date/Time
request due dt	Date/Time
request completion dt	Date/Time
action name	Text
assigned staff name	Text
request item name	Text
customer name	Text
organization name	Text
comment txt	Text
check num	Text
received amt	Text
last changed supplier id	Text
last changed dtm	Date/Time
rowversion num	Binary

Web - FOIA DATA ENTRY : Table

Field Name	Data Type
request num	AutoNumber
nara org cd	Text
request id	Text
foia complexity cd	Text
requested records cat cd	Text
foia determination cd	Text
request dt	Date/Time
request receipt dt	Date/Time
referral start dt	Date/Time
referral completion dt	Date/Time
request completion dt	Date/Time
nondis b1 flg	Yes/No
nondis b2 flg	Yes/No
nondis b3 flg	Yes/No
nondis b4 flg	Yes/No
nondis b5 flg	Yes/No
nondis b6 flg	Yes/No
nondis b7a flg	Yes/No
nondis b7b flg	Yes/No
nondis b7c flg	Yes/No
nondis b7d flg	Yes/No
nondis b7e flg	Yes/No
nondis b7f flg	Yes/No
nondis b8 flg	Yes/No
nondis b9 flg	Yes/No
nondis a flg	Yes/No
nondis b flg	Yes/No
nondis c flg	Yes/No
nondis d flg	Yes/No
nondis e flg	Yes/No
nondis f flg	Yes/No
nondis g flg	Yes/No
nondis h flg	Yes/No
nondis i flg	Yes/No
nondis j flg	Yes/No
requester last name	Text
requester first name	Text
requester middle initial name	Text
requester org name	Text
requester street name	Text
requester city name	Text
requester state cd	Text
requester postal cd	Text
requester country name	Text
requester telephone num	Text
requester email addr	Text
request subject txt	Text
assigned to name	Text
comment txt	Text
nondis b3 statute name	Text
last changed supplier id	Text
last changed dtm	Date/Time
rowversion num	Binary
old source name	Text
old foia num	Number

4.2   Why the Written Request and FOIA Information is Being Collected

The information is collected so that units can reply to requests from the public and manage the process of doing so.

4.3   Intended Use of this Information

The information is used by the respective NARA units to process the requests. PMRS extracts non-sensitive fields in order to measure performance   The web logs have no analytical or data mining or reporting ability

4.4   Sharing of Collected Information

Units can see only their own data, not each others'   The web log enforces this based on individual logins. The web application does not share this data at all.

4.5   Opportunities for Individuals to Decline Providing Information

None. If individuals want NARA records, they must tell us what they want and give us a way to contact them.

4.6   Security of Collected Information

4.6.1   How will the data be verified for accuracy, timeliness, and completeness?

a)   The people entering the data check it

b)   The units check the figures that get published through PMRS, as these reflect on their performance.

c)   Central offices spot check the data in the logs during regular inspections, referring to the hard copies of the requests and replies.

4.6.2   How will consistent use of the system and data be maintained in all sites?

Uniform instructions have been created for all fields. These are available through the online help as well as in companion User Guides.

Extensive field and cross-field validations are built into the logs themselves. These prevent mistakes such as dates from last year or completion dates earlier than receipt dates.

Central offices spot check the data in the logs during regular inspections.

4.6.3   What are the retention periods of data in this system?

Three years   This is set by the PMRS records schedule, N1-064-03-1.

4.6.4   What is the procedure for disposition of the data at the end of the retention period?

Per the schedule, the data is destroyed. This is accomplished by a SQL Server scheduled job that runs every October

4.6.5   Is the system using technologies in ways that the Agency has not previously employed?

No

4.6.6   How does the use of this technology affect public/employee privacy?

N/A. No such technology is being used.

4.6.7   Does the system meet IT security requirements?

Yes. PMRS has NARA C&A approval.

4.6.8   Has a risk assessment been performed for this system?

Yes.

4.6.9   Describe any monitoring, testing, or evaluation done on this system to ensure continued security of information

The units regularly view their performance on the PMRS web site. They complain if they find something amiss in the data.

At the detail level, the system stamps every changed record with the date, time, and the ID of the person making the change.

4.6.10   Identify a point of contact for any additional questions regarding the security of the system

Steve Beste, NPOL. 301-837-0918.

5.   Is this a System of Record Covered by the Privacy Act?

PMRS is not a Privacy Act system of record. Nor is it required to be.

6.   Conclusions and Analysis

6.1   Did any pertinent issues arise during the drafting of this Assessment?

Yes When we expanded PMRS to include peoples' birth dates, we realized that it was no longer appropriate to use Employee.mdb as the receiver of the extract from CHRIS. Too many people have access to Employee mdb, and they have no need to know all of the employee details.

6.2   If so, what changes were made to the system/application to compensate?

We created CHRIS Extract mdb to be the receiver of the extract from CHRIS. This is accessible only by the PMRS Administrator. Employee.mdb now has many fewer fields – only those necessary for its role as data entry portal for the performance plan and IDP check-offs.

7.   Approvals

<u>**The Following Officials Have Approved this PIA**</u>

System Manager
Susan Ashtianie
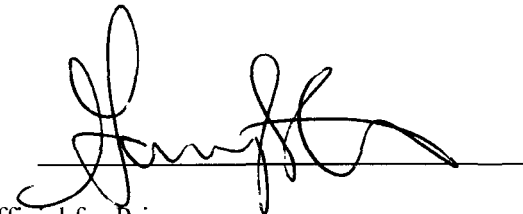Director, Policy and Planning Staff
301-837-1490

9/9/08

Senior Agency Official for Privacy
Gary M. Stern
General Counsel & Senior Agency Official for Privacy
301-837-3026

9/15/08

Chief Information Officer
Martha Morphy
Assistant Archivist for Information Services & Chief Information Officer
301-837-1992

9/17/08