

Clearance Verification System (CVS)

Privacy Impact Assessment

1. IT System or Electronic Information Collection Identification

a. Who is completing the initial screening assessment?

Project Manager, OPM/FISD/ITP/SSB.

b. Who is the IT system or electronic information collection owner?

Deputy Associate Director for Services, OPM/FISD.

c. What is the IT system or electronic information collection name?

Clearance Verification System (CVS).

d. Does the activity represent a new or significantly modified IT system or information collection?

No.

e. Is this an IT system or project or an electronic information collection?

IT system or project.

f. What is the Unique Project Identifier (UPI)?

027-00-01-02-02-1040-00-315-179.

- g. Will this IT system or electronic information collection use web technology?**

Yes.

- h. What is the purpose of the IT system or electronic information collection and why is the information being collected?**

CVS is a subsection of the Personnel Investigation Processing System (PIPS). It provides the status of active security clearances and of security clearance history. CVS also helps with reciprocity and reduces the number of requests for investigations.

- i. What is the IT system or electronic information collection status?**

Operational.

- j. Is the IT system or electronic information collection operated by OPM staff, contractor staff, or a combination of OPM and contractor staff?**

Combination of OPM staff and contractor staff.
USIS and OCIO contractors.

- k. Where is the IT system or electronic information collection physically located?**

Washington, D.C.

2. Initial Screening Assessment

- a. Is an OMB mandated PIA required for this IT system or electronic information collection?**

Yes.

b. Does the system or electronic information collection contain or collect any Personally Identifiable Information (PII)?

Yes.

c. Is this an IT system that collects PII on members of the public?

Yes.

d. Is this an electronic information collection that collects PII on members of the public?

Yes.

e. Is this an electronic information collection that collects PII on Federal employees?

Yes.

3. The PIA

3.1. Nature and Source of Information to Be Collected

a. What is the nature of the information to be collected?

The Clearance Verification System (CVS) identifies subjects, collects and stores clearance information on current, active, expired, revoked and cancelled clearances.

b. What is the source of the information?

From other people.
Other sources such as databases, web sites, etc.

3.2. Reason for Collection of Information

a. Why is the information being collected?

Clearance granting agencies and others can receive real time data regarding clearances. It can be immediately determined that someone has been investigated and cleared at the appropriate level.

b. Is there legal authority for collecting the information?

Yes.
Executive Orders 10450, 12968, 12829;
Public Law 108-458.

3.3. Intended Use of the Collected Information

a. What is the intended use of the information?

Members of investigative and intelligence community may grant or deny access to protected information.

b. For major IT investments as defined in OMB Circular A-11, a high-level data flow diagram must be prepared.

Not applicable.

3.4. Purpose and Identification of Information to Be Shared

a. Does the system share Personally Identifiable Information (PII) in any form?

Yes.
Within OPM.
Information is shared between OPM IT security professionals and IT security contractors.
With other Federal agencies.

Executive branch and intelligence agencies may determine what clearances/investigations exist, name, SSN, clearances and investigations.

With other state or local governments.

Privacy information is exchanged with state/local government to gather investigative data and records.

b. Who will have access to the PII on the system?

Users, Administrators, Developers, and Contractors.

c. Is information part of a computer matching program?

No.

3.5. Opportunities Individuals Have to Decline to Provide Information or to Consent to Particular Uses of the Information

a. Is providing information voluntary?

Yes.

Completion of information is voluntary. OPM may not be able to complete the investigation or complete in timely manner. Incomplete files may also affect the subject's placement in position and may also affect security clearance eligibility.

b. Are individuals informed about required or authorized uses of the information?

Yes.

Privacy Act Statement.

c. Will other uses be made of the information than those required or authorized?

No.

3.6. Security of Information

a. Has the system been authorized to process information?

Yes.

b. Is an annual review of the IT system or electronic information collection conducted as required by the Federal Information Security Management Act (FISMA)?

Yes.

c. Are security controls annually tested as required by FISMA?

Yes.

d. Are contingency plans tested annually as required by FISMA?

Yes.

e. Have personnel using the system been trained and made aware of their responsibilities for protecting the PII being collected and maintained?

Yes.

f. Are rules of behavior in place for individuals who have access to the PII on the system?

Yes.

General users, System/database, administrators, developers, etc.

3.7. System of Records as Required by the Privacy Act, 5 U.S.C. 552a

- a. Are records on the system routinely retrieved by a personal identifier?**

Yes.
The Privacy Act applies.

- b. Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register?**

Yes.
OPM Central - 9.

- c. Does the SORN address all of the required categories of information about the system?**

Yes
System name; System location; Categories of records; Purpose; Disclosure to consumer reporting agencies; Contesting record procedure; Notification procedure; System exempted from certain provisions of the Act; System classification; Categories of individuals covered by the system; Authority of maintenance; Routine uses of records maintained; System Manager and contact information; Record access procedure; Record source categories; Policies and practices for storing, retrieving, accessing, retaining, and disposing of records.

- d. Has any of the information in the SORN changed since the information was published?**

Yes.

- e. **Are processes in place for periodic review of Personally Identifiable Information contained in the system to ensure that it is timely, accurate, and relevant?**

Yes.

Schedule Number: 3.INV;

Item No: 2 Investigations;

Disposition: 15yrs-25yrs;

Last Job Number: N9-478-02-15.

4. Certification

A PIA is required and the OPM Chief Privacy Officer signed the PIA on August 2, 2007.