

INITIAL PRIVACY ASSESSMENT

Instructions & Template



Office of Privacy and Civil Liberties

(Revised July 31, 2008)

United States Department of Justice
Office of Privacy and Civil Liberties
Initial Privacy Assessment

What is an Initial Privacy Assessment?

An Initial Privacy Assessment (IPA) is designed to assess whether a Privacy Impact Assessment (PIA), a Privacy Act system of records notice (SORN), and/or other related privacy documents are required. The responses to the IPA will provide a foundation for both a PIA and a SORN should either or both be required, and will also help to identify any policy concerns.

The IPA incorporates the matters previously addressed in the Department's Privacy Threshold Analysis document (PTA), and thus replaces the PTA.

When should an IPA be completed?

An IPA should be completed at the beginning of an information system's development, whether the system is electronic or contains only records in paper form, and should be completed before commencement of any testing or pilot project of an information system. Additionally, an IPA should be completed any time there is a change to the information system to determine whether there are any privacy issues as a result of such a change.

How is the IPA related to the Certification and Accreditation process?

If an information technology (IT) system requires Certification and Accreditation (C&A) from the Office of the Chief Information Officer, then the completed IPA must be uploaded into the C&A Web tool as part of the C&A process. For an IT system that does not require a C&A, such as a minor application that runs on a system that does require a C&A, an IPA still should be completed to determine if a PIA, a SORN, or other related privacy documents are required for that application.

Where should the completed IPA be sent?

A copy of the completed IPA should be sent to the Office of Privacy and Civil Liberties via email to privacy@usdoj.gov. OPCL will review the IPA and determine what additional privacy documentation is required, and then will advise the Component accordingly.

Initial Privacy Assessment

I. INFORMATION ABOUT THE SYSTEM

1. Which of the following describes the type of records in the system:

- Paper-only
- Combination of Paper and Electronic
- Electronic-Only

2. Name of the System:

3. Component:

4. Project Manager Name and email address:

5. IPA Author Name and email address (if different from project manager):

6. Status of System or Project:

- This is a new system or project in development. **Do not complete Section II.**
- This is an existing system or project. **After completing Section I, complete Section II.**

7. Does the system or project collect, maintain, or disseminate any information about individuals?

YES (If yes, briefly describe the types of information about individuals in the system, and proceed to question 8.)

NO (If no, then the IPA is now complete and should be submitted to OPCL.)

8. Does the information about individuals identify particular individuals, i.e., is the information linked or linkable to specific individuals, often referred to as personally identifiable information?

YES

NO (If no, indicate how the information is not identifiable to specific individuals. For example, the information may be statistical or summary data that is presented in such a way that the particular individuals cannot be identified. **(The IPA is now complete and should be submitted to OPCL.)**)

9. Does the personally identifiable information in the system pertain only to government employees, contractors, or consultants?

YES

NO

10. Provide a general description of the system or project that describes: (a) the structure of the system and the purpose that the records and/or system serve; (b) who has access to information in the system; (c) how information in the system is accessed; and (d) how information is transmitted to and from the system. (If the system is an IT infrastructure system, please contact OPCL.)

11. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system by a personal identifier?

YES

NO (If no, proceed to question 13.)

12. Is there an existing Privacy Act System of Records Notice (SORN) that has been published in the Federal Register to cover this system? (Please consult with your component's Privacy Act officer or OPCL if assistance is needed in responding to this question.)

YES (If yes, provide the Federal Register citation.)

NO

13. If Social Security Numbers are collected, maintained or disseminated from the system, what is the purpose and legal authority for the collection or maintenance of SSNs?

14. Is there a Certification & Accreditation record within C&A Web?

Yes. Please indicate the following:

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

No

Do not know

II. EXISTING SYSTEMS

1. When was the system developed?

2. Has the system undergone any changes since April 17, 2003?

YES (If yes, explain the nature of those changes and continue to Question 3.)

NO (If no, proceed to Question 5.)

3. Do the changes to the system involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system?

YES

NO

4. Please indicate if any of the following changes to the system have occurred:
(Mark all boxes that apply.)

- A conversion from paper-based records to an electronic system
- A change from information in a format that is anonymous or nonidentifiable to a format that is identifiable to particular individuals.
- A new use of an IT system, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)
- A change that results in information in identifiable form being merged, centralized, or matched with other databases.
- A new method of authenticating the use of and access to information in identifiable form by members of the public.
- A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.
- A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.
- A change that results in a new use or disclosure of information in identifiable form.
- A change that results in new items of information in identifiable form being added into the system.

5. Does a PIA for this system already exist?

- YES (If yes, provide the date and title of the PIA and whether the PIA is posted on the web.)
- NO