



Privacy Impact Assessment
for

Public Records Tracker

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Summary

The Department of the Treasury is publishing this Privacy Impact Assessment (PIA) for Public Records Tracker (PRT), which includes the Citizens Web Portal. PRT will enable the appropriate FOIA office within the Department of the Treasury to manage and track Freedom of Information Act (hereinafter known as "FOIA") and Privacy Act (hereinafter known as "PA") requests as well as allow for online submissions of such requests. This PIA is being conducted because PRT contains Personally Identifiable Information (PII).

A. System Application/General Information

1. What is the purpose of the system/application?

The information in the system will enable the appropriate FOIA office within the Department of the Treasury to administratively control and/or process requests for records; to ensure compliance with the FOIA/PA; and to collect raw data for the annual and biennial reporting requirements of the FOIA/PA and other Department management reporting requirements.

These records may include identifiable information such as a name, address, phone number(s), and email address.

2. What legal authority authorizes the purchase or development of this system/application?

The development and implementation of the system is authorized by the Freedom of Information Act, 5 U.S.C. §552 and the Privacy Act, 5 U.S.C. §552a.

3. Under which Privacy Act SORN does the system operate? (Provide the system name and unique system identifier.)

Treasury System of Records Notice .004, published at 75 Federal Register 54429 (September 7, 2010). PRT does not have a unique system identifier.

B. Data in the System

1. What categories of individuals are covered in the system?

This system of records contains information on persons and entities that submit requests under the FOIA/PA.

2. What are the sources of the information in the system?

- a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

All PII is collected from the requester. The FOIA request number is assigned by PRT upon receipt of the request.

- b. What Federal agencies are providing data for use in the system?**

No other federal agency is providing data for use in the system.

- c. What State and/or local agencies are providing data for use in the system?**

No state or local agency is providing data for use in the system.

- d. From what other third party sources will data be collected?**

No third-party sources are providing data for use in the system.

- e. What information will be collected from the employee and the public?**

All PII is collected from the requester, which includes the requester's name, address, phone number(s), and e-mail address.

3. Accuracy, Timelines, and Reliability

- a. How will data collected from sources other than bureau records be verified for accuracy?**

All PII will be provided by the requester. In the event the requester incorrectly inputs the information, the requester has the ability to correct/update this information at any time. Requester must acknowledge by e-signature that the provided data is accurate.

- b. How will data be checked for completeness?**

PRT System validates that all fields contain data before submission is permitted. Requester must acknowledge by e-signature that the provided data is complete.

- c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models.)**

All PII will be provided by the requester. In the event the requester needs to change any information, s/he has the ability to update this information at any time. Requester must acknowledge by e-signature that the provided data is accurate.

- d. Are the data elements described in detail and documented? If yes, what is the name of the document?**

The only data elements collected include the name, address, phone number(s), and email address of the requester, which are solely used for the purposes of contacting the requester in the event additional information is needed and to provide the FOIA response.

C. Attributes of the Data

- 1. Is the use of the data both relevant and necessary to the purpose for which the system is being designated?**

Yes. The information is being collected to enable the appropriate FOIA office within the Department of the Treasury to manage and track the FOIA request as well as to respond to the requester.

- 2. 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, the system does not aggregate nor derive new data.

- 3. Will the new data be placed in the individual's record?**

No, the system does not aggregate nor derive new data.

- 4. Can the system make determinations about employees/public that would not be possible without the new data?**

No, the system does not aggregate nor derive new data.

- 5. How will the new data be verified for relevance and accuracy?**

The system does not aggregate or derive new data.

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

The system does not consolidate data.

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

The system does not consolidate processes.

- 8. How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Typically, data is retrieved by the FOIA request number. Yes, the system does allow for data to be retrieved by a personal identifier such as name, address, or email address if necessary.

- 9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

There is no need or precedence for generating reports on individuals; however the PRT system has the capability.

D. Maintenance and Administrative Controls

- 1. 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 system is only located at one site. The data is maintained on a FISMA-compliant Software-as-a-Service (SaaS) system located in the metropolitan Washington, DC area.

- 2. What are the retention periods of data in this system?**

In accordance with the National Archives Records Administration's General Record Schedule 14 -Information Services Records, PRT records are maintained for a period of six years.

- 3. 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?**

On a quarterly basis, a PRT administrator will execute a report query against all of the records to determine which have exceeded the six-year threshold. These records will be assessed to ensure they are no longer required and will, subsequently, be deleted from the system.

- 4. Is the system using technologies in ways that the bureau/office has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

Yes, requesters will now be able to submit their FOIA/PA requests online.

- 5. How does the use of this technology affect public/employee privacy?**

Allowing requests to be submitted online simplifies the FOIA/PA request process. Although the user's personal information is traversing the internet, the PRT system employs the HTTPS protocol with encryption to protect the user's data in transit.

- 6. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

Data collected by the PRT system can be used to identify and locate a requester in the event additional/clarifying information is needed to fulfill the FOIA/PA request. The PRT system does not provide the capability to monitor individual as it is a system designed to simply track FOIA/PA requests.

- 7. What kinds of information are collected as a function of the monitoring of individuals?**

The system does not provide a monitoring capability.

- 8. What controls will be used to prevent unauthorized monitoring?**

The system does not provide a monitoring capability.

- 9. Under which Privacy Act SORN does the system operate? Provide number and name.**

Treasury System of Records Notice .004, published at 75 Federal Register 54429 (September 7, 2010).

- 10. If the system is being modified, will the Privacy Act SORN require amendment or revision? Explain.**

The Privacy Act SORN will be amended to put the public on notice that e-mail addresses will also be collected.

E. Access to Data

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

Information in the system is accessible by the appropriate FOIA offices and their points of contact. All access to the system is by Treasury personnel or contractors operating under a Treasury contract.

- 2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

Authorized users will be restricted to the minimal amount of data in a record that is required to (i) fulfill a verifiable business function in connection with the Program or (ii) comply with applicable legal requirements. Access criteria, procedures and responsibilities are documented in the PRT System Security Plan (SSP). These criteria are enforced by a role-based access control policy which is based on the specific job functions of individual employees who support the PRT Management Team.

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

Authorized users will be restricted to the minimal amount of data in a record that is required or appropriate to (i) fulfill a verifiable business function in connection with the PRT Management Team or (ii) comply with applicable legal requirements. Access to all data is enforced by a role-based access control policy based on the specific job functions of individual employees who support the PRT Management Team.

4. What controls are in place to prevent the misuse (e.g., unauthorized browsing of data) by those having access? (list processes and training materials.)

Safeguards designed to protect information contained in the system against unauthorized disclosure and access include, but are not limited to: (i) Department policies and procedures governing privacy, information security, operational risk management, and change management; (ii) conducting background checks on all personnel with access to the system of records; (iii) training relevant personnel on privacy and information security; (iv) tracking and reporting incidents of suspected or confirmed breaches of information concerning borrowers; (v) establishing physical and technical perimeter security safeguards; (vi) utilizing antivirus and intrusion detection software; (vii) performing risk and controls assessments and mitigation; and (viii) establishing technical and physical access controls, such as role-based access management and firewalls.

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, was Privacy Act contract clauses inserted in their contracts and other statutory and regulatory measures addressed?

Yes, the PRT system was designed and developed by contractors.

Yes, as required by the Treasury contracts and acquisitions office, the PRT contract contains all required PA clauses, which holds the contractor equally accountable for all Treasury data in the PRT system including data deemed PII.

6. Do other systems share data or have access to the data in the system? If yes, explain.

No. The data in the PRT system is neither shared with nor accessed by any other system.

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

The PRT Management Team will be responsible for protecting the privacy rights (as specified in the Privacy Act, 5 U.S.C. § 552a, and other relevant legal requirements) of the public and employees affected by the collection and maintenance of this information.

8. Will other agencies share data or have access to the data in this system (e.g. Federal, State, Local, and Others)?

Other agencies will not have access to information contained in the system, except as permitted by the PA or the System of Records Notice for this system (Treasury System of Records Notice .004, published at 75 Federal Register 54429 (September 7, 2010)) which details a number of Routine Uses to allow disclosure of data from this system to other Federal Agencies.

Disclosure of information from this system may be made without consent (1) to a court, or a Federal State or local agency relating to the enforcement or adjudication of civil or criminal law, or providing legal advice; (2) to a congressional office in response to your request to a member of Congress; (3) to make a determination as to access, to amend a record, or to verify an individual's identity; (4) to contractors in performance of a contract; (5) to NARA for records management purposes; and (6) to other entities for the purpose of mitigating a data breach such as the suspected or confirmed compromise of an economic or property interest, identity theft, or fraud.

For more information regarding the routine uses of this information, go to Treasury System of Records Notice .004 which sets forth the routine uses in more detail.

9. How will the data be used by the other agency?

Other agencies will not have access to information contained in the system, except as permitted by the PA or the System of Records Notice for this system (Treasury System of Records Notice .004, published at 75 Federal Register 54429 (September 7, 2010)) which details a number of Routine Uses to allow disclosure of data from this system to other Federal Agencies.

10. Who is responsible for assuring proper use of the data?

The PRT Management Team is responsible for assuring that information contained in the system is used properly.

RESPONSIBLE OFFICIALS:

1. Program Manager
Name: Hugh Gilmore

Signature: 

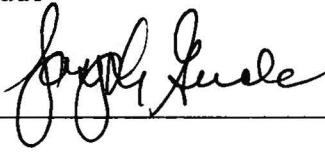
2. System Manager
Name: Marcus Smallwood

Signature: 

3. Information Systems Security Manager
Name: Scott Hill

Signature: 

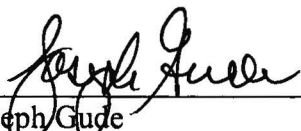
4. Privacy Lead
Name: Joseph Gude

Signature:  3/25/2011

5. IT Review Official
Name: Scott Hill

Signature: 

Approval Signature

 3/25/2011

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