PRIVACY IMPACT ASSESSMENT

Electronic Document Managing Software Platform (EDMS)

6/29/2015

PART II. SYSTEM ASSESSMENT

A. Data in the System

Question	Explanation/Instructions
1. Describe all information to be included in the system, including personal data.	a. The purpose of the Electronic Document Management Software (EDMS) system is to serve as a repository for the PBS's documents to reduce paper storage and provide reliable and secure access to documents where and when they are needed. The system includes any documents and records which are not maintained in other enterprise systems. This may include documents such as unsolicited resumes from the general public, suitability adjudication letters, training and warrant documents for GSA employees, and other documents which may contain information subject to the Privacy Act.

b. Resumes include name, personal e-mail address, home address, home phone number, and other personal information. Suitability adjudication letters include name and adjudication decision. Employee records include names and may also include gender, race, birth date, age, home e-mail address, home address, home phone number, Social Security Number, employment history, and similar personal information. |
1a. What stage of the life cycle is the system currently in?	Operation/Maintenance
2a. What are the sources of the information in the system?	Information is contained in documents submitted by the individual or generated in the course of performing GSA business. Resumes are submitted by members of the general public for review and consideration for possible job opportunities. Documents containing employee information are generated by employees, supervisors, and program managers for purposes such as tracking contracting warrant levels and expiration dates, tracking intern and co-op program requirement completion, maintaining documents such as telework agreements and travel records, and for processes which precede or follow the use of automated HR systems.
2b. What GSA files and databases are used?	The EDMS is a document management system. It could potentially include documents from any GSA system which generates documents or reports.
2c. What Federal agencies are providing data for use in the system?	None

2d. What State and local agencies are providing data for use in the system?	None
2e. What other third party sources will the data be collected from?	None
2f. What information will be collected from the individual whose record is in the system?	N/A
3a. How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?	N/A. The EDMS serves as a repository for documents generated by or created for other systems and GSA business processes. No data is collected for this system.
3b. How will data be checked for completeness?	N/A
3c. Is the data current? How do you know?	N/A
4. Are the data elements described in detail and documented? If yes, what is the name of the document?	N/A. The EDMS serves as a repository for documents generated by or created for other systems and GSA business processes. It is a collection of documents rather than a collection of data elements.

B. Access to the Data

Question	Explanation/Instructions
1a. Who will have access to the data in the system?	Access is limited to authorized employees and contractors of GSA. Access is role-based and organization-specific.
1b. Is any of the data subject to exclusion from disclosure under the Freedom of Information Act (FOIA)? If yes, explain the policy and rationale supporting this decision.	N/A. The EDMS serves as a repository for documents generated by or created for other systems and GSA business processes. Any exclusion would be governed by those processes.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Access control is based on existing controls on paper and electronic documents. Document owners specify which business roles are authorized to have access to each type of document in the EDMS system. The EDMS maintains an access history.
3. Will users have access to all data in the system or will the user's access be restricted? Explain.	Access control is based on existing controls for paper and electronic documents.
4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?	Access groups (roles) are organization-specific. Within each role, users can only see the documents in their own organization's cabinet. In order to see documents in another organization's cabinet, they must be assigned to one of that organization's roles. Document owners have the ability to further restrict access on a document or folder-level basis.
5a. Do other systems share data or have access to data in this system? If yes, explain.	No PII is exchanged with other systems.
5b. Who will be responsible for protecting the privacy rights of the clients and employees affected by the interface?	Kevin M. O'Malley, Project Manager CAD/CIFM Team - PGAC

6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	None
6b. How will the data be used by the agency?	N/A
6c. Who is responsible for assuring proper use of the data?	N/A
6d. How will the system ensure that agencies only get the information they are entitled to?	N/A
7. What is the life expectancy of the data?	Life expectancy of documents is variable depending on the type and purpose of the document. GSA Handbook OAD P 1820.2A, GSA Records Maintenance and Disposition System, is used for determining disposition requirements. GSA_File_Plan_Upda ted_03_29_12.pdf
8. How will the data be disposed of when it is no longer needed?	Documents are deleted when no longer needed.

C. Attributes of the Data

Question	Explanation/Instructions
1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Employee Name, Person Name – used to identify the individual to whom the document pertains
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	No
2b. Will the new data be placed in the individual's record (client or employee)?	N/A
2c. Can the system make determinations about individuals that would not be possible without the new data?	N/A
2d. How will the new data be verified for relevance and accuracy?	N/A
3a. If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain.	N/A
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	N/A
4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Documents may be accessed via full-text search or by name as a metadata value (if associated with the document and populated). Search results will only return documents to which the searcher has been granted access.

5. What are the potential effects on the privacy rights of individuals of: a. Consolidation and linkage of files and systems; b. Derivation of data; c. Accelerated information processing and decision making; and d. Use of new technologies. How are the effects to be mitigated?	*a.* *N/A* *b.* *N/A* *c.* *N/A* *d.* *The EDMS maintains a record of access history*

D. Maintenance of Administrative Controls

Question	Explanation/Instructions
1a. Explain how the system and its use will ensure equitable treatment of individuals.	The EDMS serves as a repository for documents generated by or created for other systems and GSA business processes. It ensures that documents are available when and where they are needed while limiting access to employees who have a business need for using the document. The EDMS does not process data.
1b. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites?	The EDMS system is centrally located in Chantilly, VA and accessed via network connections.
1c. Explain any possibility of disparate treatment of individuals or groups.	The EDMS serves as a repository for documents generated by or created for other systems and GSA business processes. It does not process data.
2a. What are the retention periods of data in this system?	Retention period of documents is variable depending on the type and purpose of the document. GSA Handbook OAD P 1820.2A, GSA Records Maintenance and Disposition System, is used for determining retention and disposition requirements.
2b. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Currently, disposal procedures are based on existing procedures for paper and electronic documents. Document owners dispose of documents in accordance with GSA Handbook OAD P 1820.2A, GSA Records Maintenance and Disposition System. Under consideration for a later phase is a module to remind document owners when documents reach the end of their retention period to aid in timely disposal.
2c. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The EDMS serves as a repository for documents generated by or created for other systems and GSA business processes. It does not process data. The EDMS provides versioning capability, showing only the most recent version of a document by default. It also includes version notes, creation and modified dates to support determination of timeliness.

3a. Is the system using technologies in ways that Federal agencies have not previously employed (e.g. Caller-ID)?	No
3b. How does the use of this technology affect individuals' privacy?	N/A
4a. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	Some documents such as resumes and telework agreements contain home addresses provided by the individual.
4b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	No
4c. What controls will be used to prevent unauthorized monitoring?	N/A
5a. Under which Privacy Act System of Records notice (SOR) does the system operate? Provide number and name.	Employee related files: GSA/Agency-1 Other files: GSA/Agency-7
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	N/A