


GSA Privacy Impact Assessment (PIA): PIA-396  
 Created Date: 6/9/2022 4:50 PM Last Updated: 7/13/2022 1:16 PM


## Instructions

### Privacy Impact Assessment (PIA)

The Privacy Impact Analysis (PIA) questionnaire is applicable to information systems which store or process privacy data. The questionnaire collects information about the types of privacy data which are stored and processed, why it is collected, and how it is handled. A PIA is required based on the results of a Privacy Threshold Analysis (PTA) questionnaire that has been completed for the information system.

Review the following steps to complete this questionnaire:

**1) Answer questions.** Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.

**2) Add Comments.** You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.

**3) Change the Status.** You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.

**4) Save/Exit the Questionnaire.** You may use any of the buttons at the bottom of the screen to save or exit the questionnaire. The 'Save and Close' button allows you to save your work and close the questionnaire. The 'Save and Continue' button allows you to save your work and remain in the questionnaire. The 'Cancel' button closes the questionnaire without saving your work.

**00 Default Layout**

**Workflow Status:** 99 Workflow Complete

## General Services Administration Privacy Office Contact Information

Please send any questions or comments to [gsa.privacyact@gsa.gov](mailto:gsa.privacyact@gsa.gov) or US Mail.

GSA IT

Chief Privacy Officer

1800 F Street NW, Washington, DC 20405

## PIA

### General Information

<b>PIA ID:</b>	PIA-396	<b>PIA Status:</b>	Completed
<b>Authorization Package (System Name):</b>	GSA Advantage	<b>This is a RPA:</b>	No
<b>Assessment Date:</b>	7/13/2022	<b>Is Latest:</b>	Yes
<b>FISCAL Year:</b>	2022	<b>PIA Required (From Authorization Package):</b>	Yes
<b>Final FISCAL Year:</b>		<b>PIA Expiration Date:</b>	7/13/2023
<b>Export PIA:</b>		<b>Final PIA Expiration Date:</b>	7/13/2023

### Override / Reopen Explanation

**Override FISCAL Year:**

**Reopened Explanation:**

**Override PIA Expiration Date:**

## Completed By

### Completed by (Submitter) Section

<b>Completed (Submitted) by:</b>	Roberts, John F	<b>Submission Status:</b>	Re-Submitted
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The E-Buy component of GSA Advantage is an online Request for Quote (RFQ) / Request for Proposal (RFP) system designed to allow government buyers to request information, find sources, and prepare RFQs/RFPs online for millions of services and products offered through GSA's multiple award schedules (MAS) including Government Wide Acquisition Contract (GWAC) contractors and GSA Technology Contracts.

For Federal agencies (buyers), e-Buy maximizes their buying power by leveraging the power of the Internet to increase Schedule and GWAC contractor participation to obtain quotations that result in best value purchase decisions, large quantity purchases, big ticket items, and purchases with complex requirements.

For Schedules and GWAC contractors (sellers), e-Buy provides greater opportunities to offer quotations and increase business volume for supplies and services provided under their Schedule contracts and GWACs.

- Defense Housing Agency (DHA) Portal is also added to the E-Buy application. It provides OMB Max authentication to the existing and new users. Refer to Appendix D and documents URL (<https://drive.google.com/drive/folders/0B2d1MsfcsLSYWmhTOHVkUUDlQUk>)
- eBuy Tech Refresh: eBuy (Buyer and Seller) completed a technology refresh that upgraded the web front end from a legacy Java Struts web framework to a modern Angular JS 7 based user interface.
- eBuy Mobile

A mobile accessible web application, primarily for the vendors to access RFQ related information as well as getting alerts/notifications on RFQ.

- eBuy Open

eBuy open is a web application that has RFQ data accessible and view-able for information purposes.

- E-Library

The Schedules E-Library system is the source for the latest GSA schedules contract award information. This system provides schedule customers with a centralized source for researching GSA schedules 24 hours a day. E-Library contains basic ordering guidelines, complete schedule listings, and a powerful search engine which allows a user to search by keyword text, schedule number, special item number (SIN), contractor name and contract number. In addition, e-Library provides for comprehensive terms and conditions for other specialized contracting vehicles such as GWACs. E-Library is updated daily to provide the latest award information and links directly to GSA's premier e-Commerce shopping site, GSA Advantage.

- Contracting Officer Review System (CORS)

CORS was created as a means to provide contracting officer oversight and review of incoming vendor catalogs. It provides for the review and approval of both FAS and VA Schedule contracts. CORS is currently accessed via the Web by contracting officers within both FAS and the VA.

- AAC Assignment

AAC is a web based application that allows customers to request a password for a newly assigned AAC and allows the user agencies' supervisors to approve the password request before a customer can use AAC as the method of payment. This also provides admin capabilities to GSA helpdesk to manage the approval process.

- Virtual Stores

Air Force Virtual Store, United States Department of Agriculture (USDA) Virtual Store, VA Virtual Store, Department of Defense U.S. Marine Corps Servmart (USMC Servmart) and U.S. Department of Homeland Security (DHS) Advantage. Virtual Stores are a customized version of GSA Advantage. Customizations include agency-specific graphics, content, product inventory, Blanket Purchase Agreements (BPAs), and business rules.

- Advantage Customer Information System (ACIS)-AAC Admin Tool (Behind Firewall - internal facing)

ACIS is a Web-based customer support system utilized primarily by the Advantage Help Desk staff in providing customer service to GSA Advantage customers. It provides access to real-time and historical revenue data within the GSA Advantage database in a dynamic and comprehensive manner.

The Struts based Advantage Customer Information System(ACIS) Application and Advantage Password Assignment (AAC Admin Tool) merged together and transformed into the new Angular Application using Angular JS7, Semantic UI for the User Interface, The Angular Components accessing the data through the current java application interface using the reset web services running on Jboss with Java. The new url in use <https://etoolssupport.fas.gsa.gov/acis/welcome>

- GSA Advantage Spend Analysis Program (ASAP)

ASAP is a centralized reporting tool designed to give authorized users access to GSA Advantage sales and statistical data. Reports are designed to return data results based on user determined report time period (i.e., dates), procurement tools (e.g., schedules or stock), and additional criteria (e.g., socioeconomic factors).

- Vendor Support Center (VSC) Web Site and Vendor Help Desk

The VSC is a public Web site used to support both GSA and VA vendors. The site posts pertinent and useful information regarding GSA Advantage, reporting quarterly sales, contract administration, and various business opportunities. In conjunction with the Web site, GSA provides a manned Help Desk to help vendors with all of the functions supported by the Web site.

- VSC VA Sales Portal

The Department of Veterans Affairs (VA) National Acquisition Center negotiates, awards, and administers Federal Supply Schedule (FSS) contracts for various healthcare-related products and services. All VA managed FSS contract holders are required to report contract sales on a quarterly basis. This website provides an electronic mechanism for submission of sales data to the VA.

- VSC eGov Travel

VSC eGov Travel is a Web site that allows eGov Travel Service vendors to report their quarterly sales and number of units sold.

- VSC Intranet

Internal website that is used by the helpdesk and it provides vendor information.

- Schedules Input Program (SIP)

SIP is desktop client software that allows FAS and VA schedule vendors to upload catalog information, including text files and Terms and Conditions files, for posting onto GSA Advantage via the GSA secure File Transfer Protocol (FTP) server. SIP also allows purchase order downloads and provides customer status for orders.

- Purchase Order (PO) Portal

The GSA PO Portal provides a means for GSA contractors to gain immediate access to orders placed through Advantage and eBuy systems. Orders generated by GSA Advantage can be accessed by logging into the PO Portal at [www.poportal.gsa.gov](http://www.poportal.gsa.gov). This Web site allows users to view or print orders in the Portable Document Format (PDF) format or download orders in Excel (.xls), text (.txt), commercial XML (cXML), or PDF. XML or EDI. If they choose, contractors may also receive orders directly (without using the PO Portal) in an XML or EDI format. PO Portal is configured to use Okta IAM MFA solution for Identification and Authentication. Refer to Types of Users table in section 9.3

- GSA Global Supply (GGS)

GGS is an implementation of the GSA Advantage Virtual Store concept that allows customers to browse and electronically order items from Global Supply programs. The Global Supply store offers a substantially different “look and feel” than GSA Advantage.

- GSA Schedules eMaintenance - Web (Behind firewall; internal-facing)

GSA Schedules eMaintenance-Web is a Web-based Intranet application that provides general schedules maintenance-comprising capabilities such as merging schedules and updating SIN data for display within Schedules e-Library.

- Agency Address Code (AAC) Inquiry

AAC Inquiry is an Intranet Web application that provides address information for GSA and DoD assigned Activity Address Codes, including GY, GZ, GX, and GP series AACs designated for GSA Advantage. In addition, you can find the Transportation Control Number (TCN) associated with a PO or requisition generated through GSA Advantage. Access to the Web application is controlled by validating User ID and password.

- E-BuyAdmin

E-BuyAdmin is an Intranet Web application that GSA Advantage Help Desk uses to assist e-Buy buyer and seller communities with issues related to Request for Quotes (RFQs) and Responses (Quote) that were created in the e-Buy application. This application provides search capabilities on RFQ ID, Quote ID, and date range search on RFQs. E-BuyAdmin also has the ability to assign RFQ password to forward to another e-Buy user. Access to the Web application is controlled by validating User ID and password.

- E-BuyConnect

E-Buy Connect web service enables other agencies to integrate their contract writing system with eBuy to publish the solicitation seamlessly to eBuy.

- Table Maintenance Tool (TMT)

TMT is used to refine the management of BPAs awarded by GSA to help various federal agencies make efficient business decisions when acquiring products and services.

- Credit Card Authorization Application (CCAATH)

The CC Auth is a web based application for National customer service to assist customers with credit card payment discrepancies.

- 8(a) STARS II Pricing Tool - (GWAC)

The 8(a) STARS II Pricing Tool allows users to view fully burdened labor hour ceiling rates for 8(a) STARS II industry partners. This self-service tool allows acquisition personnel to quickly perform market research to make better business decisions.

- X12 Admin

X12Admin is an internal web application that is used by GSA-IT and Helpdesk personnel to monitor, manage and track the catalog transactions that are in X12 specification.

- Master Product Manager (MPM)

MPM is an internal web application that is used by GSA-IT personnel to monitor, manage and track the catalog transactions that are in X12 specification.

- Popresentation

Popresentation is a PO Portal application. - Popresentation is referred in URL for OrderProcessing Console and is used by Advops internally to check order errors/status

(<https://etoolssupport.fas.gsa.gov/POPresentationWeb/>)

Popresentation is backend process that is deployed to jboss instance called "popresentation" and connects to EDI Gateway to send PO's for further processing. Custom Solution- Categorization Tool

Custom Solution is a stand-alone background process assign categorization data for the products that are submitted by vendors through their catalog update process.

- GSA Advantage Contact 2GIT Vendors Interface

Contact 2GIT Vendors: A new feature in Advantage called "Contact 2GIT Vendors" which will allow users to create a plain text email without attachments from the Advantage System and send it to 2GIT Blanket Purchase Agreement (BPA) vendors, for the purpose of corresponding with product vendors. Note: This new feature is similar to an existing baseline feature in Advantage which allows users to send text emails to the recipients. Refer to appendix I

Note: The email server "smtpt.gsa.gov" resides outside of Advantage security boundary and email communication is through port 25 over SMTP Protocol.

- OKTA Application Identity as a Service (IDaaS)

OKTA provides identity and access management (IAM) solutions to the organization for applications with a multi-factor authentication (MFA) requirement. It also provides cloud based user storage to organize and manage internal and external users and their attributes. It enables user on-boarding and off-boarding with seamless communication between its universal directory and cloud applications through account life-cycle management.

Phase 1 - includes Advantage, Virtual Stores, USMC and Global Supply, eBuy (buyer), eBuy Connect and ASAP. Phase 1 is already implemented.

Phase 2 - includes all other users not covered in Phase 1 and integrates Okta MFA to the following applications PO Portal, CORS and AAC Inquiry. Phase 2 is already implemented.

- Product Information and Communications System (PICS)

PICS is a Sub-System of GSA Advantage. PICS SSP is attached as an appendix to GSA Advantage SSP. Product Information and Communications System (PICS) is an n-tier enterprise system developed in-house for GSA. It is a single, consolidated, accurate and up-to-date information source for products marketed by GSA Global Supply. PICS manages and distributes product catalog data to various internal and external order management systems (Order Management System – OMS, GSA Enhanced Checkout – GECCO, GSA Advantage) and generates paper-based catalogs for consumption by GSA customers. PICS is used to control product availability on the order management systems (OMS, GECCO, GSA Advantage) and product item pricing under certain GSA programs.

The catalogs maintained by PICS may consist of National Stock Number (NSN) product items or product items available via Extended Direct Delivery (EDD/4PL), which includes the GSA Global Supply and 4PL programs.

The GSA Advantage process flow from system input to system output provides authorized customers access to millions of commercial products and services at the lowest possible prices. Anonymous users may browse the site's catalog listings. Registered users may browse and shop the GSA Advantage Web site. To obtain an account, a user must have user identification, password, and an e-mail address. During the registered user's session, if the user wishes to place an order, a Shopping Cart is created and parked (saved). GSA Advantage assigns a cart number to all parked carts which enable the shopper to return to the cart at a later date using the "Retrieve Parked Cart" option on the Main Menu.

In addition to browsing and shopping online, GSA Advantage allows vendors to update product offerings and prices online. Vendors can electronically submit catalogs via EDI or via GSA's SIP) software. The SIP software is available at no cost to vendors on the VSC Web site at <http://vsc.gsa.gov>.

The following is a list of system user organizations (both internal and external), data categories, and types of outputs the system provides:

- Primary Users - Internal:
  - FAS employees:
    - Office of Acquisition
    - Office of the Chief Information Officer
    - Office of Distribution Management
    - Office of Supply
    - Regional Offices
- Primary Users - External:
  - Vendors
  - Federal Civilian Customers
  - Federal Military Customers
  - State and Local Customers
- Data Categories:
  - Customer Information
  - Payment Information (AAC or SmartPay Card, a government credit card)
  - Purchase Orders
  - Customer Sales Information
  - RFQs
  - Contractor Information
  - Order Information
  - NSN/Manufacturer Part Numbers Information
  - Item Descriptions
  - Inventory Information

- Shipping Information
- Order Confirmation
- Requisition Status
- Outputs:
  - Customer Service Callback
  - Electronic Files
  - Emails/Pages
  - EDI and SIP Transactions
  - Reports
  - RFQ Report
  - Statistics
  - Warning and Error Messages
  - Purchase Orders

**PIA-0.1:** Is this a new PIA or Recertification request? New PIA

**PIA-0.1Changes:** If you are reviewing this for annual recertification, please confirm if there are any changes in the system since last signed PIA?

**Comments**

Question Name	Submitter	Date	Comment	Attachment
PIA-1.4	Rowe, Charlene D	6/21/2022	Please include the records retention schedule for this system.	

**1.0 Purpose of Collection**

**PIA-1.1:** What legal authority and/or agreements allow GSA to collect, maintain, use, or disseminate the information? Individual enters PII (Home Address) to receive shipment of Home Office Equipment to that address. Individual must consent to entering home address, and language on site include guidance suggesting using alternate address (such as agency local office). Language notes that name and home address will be shared with vendor shipping goods.

**PIA-1.2:** Is the information searchable by a personal identifier, for example a name or Social Security number? Yes

**PIA-1.2a:** If so, what Privacy Act System of Records Notice(s) (SORN(s)) applies to the information being collected? Existing SORN applicable

**PIA-1.2 System Of Record Notice (SORN) CR:**

**PIA-1.2 System of Records Notice(s) (Legacy Text):** What System of Records Notice(s) apply/applies to the information? [GSA/Agency-1 SORN](#)

**PIA-1.2b:** Explain why a SORN is not required.

**PIA-1.3:** Has an information collection request (ICR) been submitted to or approved by the Office of Management and Budget (OMB)? No

**PIA-1.3 Information Collection Request:** Provide the relevant names, OMB control numbers, and expiration dates.

**PIA-1.4:** What is the records retention schedule for the information system(s)? Explain 6 years for Financial Records, PII, PCI, and Audit Logs for sensitive data access. This is based on the following 2

how long and for what reason the information is kept.

NARA Categories (which both require 6 years record retention):

GRS 1.1/010 Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting - Official record held in the office of record DAA-GRS-2013-0003-0001

Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting. Many records included in this item are maintained by accountable officers to account for the availability and status of public funds, and are retained to enable GAO, Office of Inspector General, or other authority audit. Financial transaction records include those created in the course of procuring goods and services, paying bills, collecting debts, and accounting for all finance activity, per the following definitions.

Temporary. Destroy 6 years after final payment or cancellation, but longer retention is authorized if required for business use. Official record held in the office of record.

Procuring goods and services is the acquisition of physical goods, products, personal property, capital assets, infrastructure services such as utilities, and contracted personnel services to be used by the Federal Government. Paying bills means disbursements of federal funds for goods and services, and fulfilling financial obligations to grant and cooperative agreement recipients. Procurement and payment records include those such as:

- contracts
- requisitions
- purchase orders
- interagency agreements
- Military Interdepartmental Purchase Requests (MIPRs)
- printing requisitions to the Government Printing Office
- memoranda of agreement specifying a financial obligation
- solicitations/requests for bids, quotations or proposals for contracts and competitive grants
- proposals, quotations, bids (accepted, rejected, unopened) for contracts and competitive grants
- contingent fee justifications
- legal and financial instruments such as bond and surety records
- FAIR Act (A-76) records linked directly to specific procurement actions
- credit card/purchase card/charge card statements and supporting documentation
- vendor tax exemption records
- invoices

- leases
- recurring financial transactions such as utility and communications invoices
- documentation of contractual administrative requirements submitted by contractors such as status reports
- correspondence and papers pertaining to award, administration, receipt, inspection of and payment for goods and services in this list
- records of financing employee relocations

GRS 03.2/031 System Access Records. Systems Requiring Special DAA-GRS-2013-0006-0004

Accountability for Access. These are user identification records associated with systems which are highly sensitive and potentially vulnerable. These records are created as part of the user identification and authorization process to gain access to systems. Records are used to monitor inappropriate systems access by users. Includes records such as:

- user profiles
- log-in files
- password files
- audit trail files and extracts
- system usage files
- cost-back files used to assess charges for system use.

Exclusion 1. Excludes records relating to electronic signatures.

Exclusion 2. Does not include monitoring for agency mission activities such as law enforcement.

Temporary.

Destroy 6 years after password is altered or user account is terminated, but longer retention is authorized if required business use.

## 2.0 Openness and Transparency

<b>PIA-2.1:</b>	Will individuals be given notice before the collection, maintenance, use or dissemination and/or sharing of personal information about them?	Yes
<b>PIA-2.1Explain:</b>	If not, please explain.	


## 3.0 Data Minimization

<b>PIA-3.1:</b>	Why is the collection and use of the PII necessary to the project or system?	To ship Home Office Equipment ordered by the user to their home address (alternate work location)
<b>PIA-3.2:</b>	Will the system, application, or project create or aggregate new data about the individual?	No
<b>PIA-3.2Explained:</b>	If so, how will this data be maintained and used?	
<b>PIA-3.3:</b>	What protections exist to protect the consolidated data and prevent unauthorized access?	<p>Secure Data Center</p> <p>Encrypted In Transit</p> <p>Encrypted At Rest</p> <p>Not viewable by other users</p> <p>Fully assessed FISMA system with ATO with existing sensitive data (PCI)</p>



<b>PIA-3.4:</b>	Will the system monitor the public GSA employees or contractors?	GSA Employees
<b>PIA-3.4Explain:</b>	Please elaborate as needed.	GSA Employees during phase 1, Federal Employees in phase 2.
<b>PIA-3.5:</b>	What kinds of report(s) can be produced on individuals?	Their own Name and shipping address (home address) GSA Advantage Admins could pull full list
<b>PIA-3.6:</b>	Will the data included in any report(s) be de-identified?	No
<b>PIA-3.6Explain:</b>	If so, what process(es) will be used to aggregate or de-identify the data?	
<b>PIA-3.6Why Not:</b>	Why will the data not be de-identified?	No reports include home address other than those requiring address to be validated. Note GSA Advantage only includes 2 PII fields (Name, Home Address)

**4.0 Limits on Using and Sharing Information**

<b>PIA-4.1:</b>	Is the information in the system, application, or project limited to only the information that is needed to carry out the purpose of the collection?	Yes
<b>PIA-4.2:</b>	Will GSA share any of the information with other individuals, federal and/or state agencies, or private-sector organizations?	Private-Sector Organizations
<b>PIA-4.2How:</b>	If so, how will GSA share the information?	Name and shipping information will be shared with the shipper who will be tasked with delivering the products ordered. This is part of ordinary business operations for any vendor (shipping of goods to a name/address combination via a logistics company or the US Post Office).
<b>PIA-4.3:</b>	Is the information collected:	Directly from the Individual
<b>PIA-4.3Other Source:</b>	What is the other source(s)?	
<b>PIA-4.4:</b>	Will the system, application, or project interact with other systems, applications, or projects, either within or outside of GSA?	Yes
<b>PIA-4.4Who How:</b>	If so, who and how?	Name and shipping information will be shared with the shipper who will be tasked with delivering the products ordered. This is part of ordinary business operations for any vendor (shipping of goods to a name/address combination via a logistics company or the US Post Office).
<b>PIA-4.4Formal Agreement:</b>	Is a formal agreement(s) in place?	
<b>PIA-4.4No Agreement:</b>	Why is there not a formal agreement in place?	

**5.0 Data Quality and Integrity**

<b>PIA-5.1:</b>	How will the information collected, maintained, used, or disseminated be verified for accuracy and completeness?	Collected directly from the individual specifically for a shipment (home address). Note that language on the site identifies that information will be shared for shipping and if there is a specific need for confidentiality (of home address), to use an alternate shipping address (such as local agency office).
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**6.0 Security**

<b>PIA-6.1a:</b>	Who or what will have access to the data in the system, application, or project?	GSA Advantage Admins  Individual records name and home address will be delivered to vendors for shipping of goods.
<b>PIA-6.1b:</b>	What is the authorization process to gain access?	GSA Advantage Admins are hired by GSA Advantage

Complete SF86

Receive Public Trust and GSA Entry-on-Duty

Final Public Trust (not interim) is verified before SNA (admin) account is granted

**PIA-6.2:** Has a System Security Plan (SSP) been completed for the Information System(s) supporting the project? Yes

**PIA-6.2a:** Enter the actual or expected ATO date from the associated authorization package. 10/6/2021

**PIA-6.3:** How will the system or application be secured from a physical, technical, and managerial perspective? Secure Data Center

Operational System has received ATO after security control assessment (technical support provided by GSA Enterprise, GSA Policy, and GSA Advantage Operations teams, monitored by GSA SecOps).

**PIA-6.4:** Are there mechanisms in place to identify and respond to suspected or confirmed security incidents and breaches of PII? Yes

**PIA-6.4What:** What are they?

GSA Enterprise SecOps monitors traffic at the boundary/border, network segments, and Host OS. GSA Advantage receives alerts for unusual activity within the application and has an Incident Response Plan in place that includes working with GSA SecOps if an incident is identified.

## 7.0 Individual Participation

**PIA-7.1:** What opportunities do individuals have to consent or decline to provide information? Consent is given when the individual specifically enters their home address for a shipment. Note that language on the site identifies that information will be shared for shipping and if there is a specific need for confidentiality (of home address), to use an alternate shipping address (such as local agency office).

The individual can decline to provide their home address and ship to an alternate location (such as agency local office).

**PIA-7.1Opt:** Can they opt-in or opt-out? Yes

**PIA-7.1Explain:** If there are no opportunities to consent, decline, opt in, or opt out, please explain.

**PIA-7.2:** What are the procedures that allow individuals to access their information? Logging in and review profile (including shipping address).

**PIA-7.3:** Can individuals amend information about themselves? Yes

**PIA-7.3How:** How do individuals amend information about themselves? Logging in and deleting their previous shipping address (including "Home Address Checkbox"), then creating new address.

## 8.0 Awareness and Training

**PIA-8.1:** Describe what privacy training is provided to users, either generally or specifically relevant to the system, application, or project. The PII (Home Address) is collected directly from the individual specifically for a shipment. Note that language on the site identifies that information will be shared for shipping and if there is a specific need for confidentiality (of home address), to use an alternate shipping address (such as local agency office). That would remove the need for PII.

### 9.0 Accountability and Auditing

<b>PIA-9.1:</b>	How does the system owner ensure that the information is used only according to the stated practices in this PIA?	Information access is logged. The information is only shared with the shipper and the individual (via login).
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