

PRIVACY IMPACT ASSESSMENT

Office of Inspector General (OIG)
Management Information System (MIS)

January 2010

PRIVACY IMPACT ASSESSMENT

PART II. SYSTEM ASSESSMENT

A. Data in the System

| Question | Explanation/Instructions |
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| 1. Describe all information to be included in the system, including personal data. | <i>a. This system records case information for all Inspector General Investigative Cases.</i> <i>b. SSN, Fully Name, Alias, Address of Record and former addresses</i> |
| 1.a. What stage of the life cycle is the system currently in? | <i>Select: Operation/Maintenance</i> |
| 2.a. What are the sources of the information in the system? | <i>Information generally provided by the agent but could be entered after the investigation agent conducts research.</i> |
| 2.b. What GSA files and databases are used? | <i>Personnel records could be used if a GSA employee is being investigated.</i> |
| 2.c. What Federal agencies are providing data for use in the system? | None. |
| 2.d. What State and local agencies are providing data for use in the system? | None. |
| 2.e. What other third party sources will the data be collected from? | None. |
| 2.f. What information will be collected from the individual whose record is in the system? | <i>SSN Full Name, Alias, Address of Record and former addresses.</i> |
| 3.a. How will the data collected from sources other than Federal agency records or the individual be | <i>U.S. Identification Documents</i> |

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| verified for accuracy? | |
| 3.b. How will data be checked for completeness? | <i>Agents complete as much information as is available. Special Agents in Charge routinely check the information for completeness.</i> |
| 3.c. Is the data current? How do you know? | <i>Not all data is current. Historical data is kept for archive purposes.</i> |
| 4. Are the data elements described in detail and documented? If yes, what is the name of the document? | <i>No they are not.</i> |

B. Access to the Data

| Question | Explanation/Instructions |
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| 1. a. Who will have access to the data in the system? | <i>All Investigative (JI) personnel, all JPM System Developers and the Inspector General (J)</i> |
| 1.b. 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. | <p><i>Yes, If so, reference the specific exemption under the FOIA (5 U.S.C. Section (b)(1) through (9)), to support your rationale.</i></p> <p><i>Dept. of Justice guidance on exemptions:</i> http://www.usdoj.gov/oip/foi-act.htm</p> <p><i>FOIA text:</i> http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm</p> |
| 2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented? | <i>Access to the system is based on login and roles defined in Oracle.</i> |
| 3. Will users have access to all data in the system or will the user's access be restricted? Explain. | <i>Access levels are determined by role and restrict access to certain types of information based on those definitions</i> |
| 4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access? | <i>Agents and managers review other cases in the system on a routine basis to determine investigative methods and criminal trends.</i> |
| 5.a. Do other systems share data or have access to data in this system? If yes, explain. | NO |
| 5.b. Who will be responsible for protecting the privacy rights of the clients and employees | <i>OIG/JPM System Development Team Leader</i> |

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| affected by the interface? | |
| 6.a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)? | Yes, other Federal Law Enforcement Agencies |
| 6.b. How will the data be used by the agency? | <i>Data is used for litigation and investigative reporting</i> |
| 6.c. Who is responsible for assuring proper use of the data? | <i>OIG/JPM System Development Team Leader</i> |
| 6.d. How will the system ensure that agencies only get the information they are entitled to? | <i>N/A</i> |
| 7. What is the life expectancy of the data? | <i>Information is retained in the database indefinitely</i> |
| 8. How will the data be disposed of when it is no longer needed? | <i>Data will be deleted from the system via SQL and subsequently removed from backups</i> |

C. Attributes of the Data

| Question | Explanation/Instructions |
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| 1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? | <i>SSN Unique to the individual First Name – Reports Necessity Last Name – Report Necessity Address – Location requirement for Process serving</i> |
| 2.a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected? | NO |
| 2.b. Will the new data be placed in the individual's record (client or employee)? | NO |
| 2.c. Can the system make determinations about individuals that would not be possible without the new data? | NO. Not programmed into the system. |
| 2.d. How will the new data be verified for relevance and accuracy? | US Identity documents will be used by the Agents |
| 3.a. If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain. | N/A |
| 3.b. 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? | Data is retrieved by searching or entering in a form It is listed by name then pulled by record ID |

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| <p>Can it be retrieved by personal identifier? If yes, explain.</p> | |
| <p>5. What are the potential effects on the privacy rights of individuals of:</p> <p>a. Consolidation and linkage of files and systems;</p> <p>b. Derivation of data;</p> <p>c. Accelerated information processing and decision making; and</p> <p>d. Use of new technologies.</p> <p>How are the effects to be mitigated?</p> | <p>A: <i>N/A</i></p> <p>B: <i>Individual Name, Address and SSN all available</i></p> <p>C: <i>N/A</i></p> <p>D: <i>N/A</i></p> <p><i>Mitigation: Small user base, no ability to export and encrypted portable electronic equipment will keep the information secure. Should the information become compromised then actions will be taken to remove that information or further limit access..</i></p> |

D. Maintenance of Administrative Controls

| Question | Explanation/Instructions |
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| 1.a. Explain how the system and its use will ensure equitable treatment of individuals. | <i>N/A</i> |
| 1.b. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites? | <i>N/A</i> |
| 1.c. Explain any possibility of disparate treatment of individuals or groups. | <i>None</i> |
| 2.a. What are the retention periods of data in this system? | <i>Indefinitely</i> |
| 2.b. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented? | <i>Client Data Retention needs are such that no disposal is expected.</i> |
| 2.c. 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? | <i>Data is reviewed by managers and agents on a regular basis.</i> |
| 3.a. Is the system using technologies in ways that Federal agencies have not previously employed (e.g. Caller-ID)? | <i>NO</i> |

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| 3.b. How does the use of this technology affect individuals' privacy? | <i>N/A</i> |
| 4.a. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain. | <i>Yes. Information used to arrest or serve individuals</i> |
| 4.b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain. | <i>No</i> |
| 4.c. What controls will be used to prevent unauthorized monitoring? | <i>Roles and privileges as assigned in Oracle</i> |
| 5.a. Under which Privacy Act System of Records notice (SOR) does the system operate? Provide number and name. | <i>GSA/ADM-24 (Investigation Case Files)</i> |
| 5.b. If the system is being modified, will the SOR require amendment or revision? Explain. | |