PRIVACY IMPACT ASSESSMENT

THE MUSEUM SYSTEM (TMS)

March 17, 2016

A. Data in the System

Question	Explanation/Instructions
What is the specific purpose of the agency's use of the information and how does that use fit with the agency's broader mission?	The system is used by GSA to track all details pertaining to the full life cycle of Art in Architecture projects and manage the National Artist Registry in support of the Art in Architecture program. The system also supports the Fine Arts Program in managing the Fine Arts collection. The GSA dataset includes descriptive information on artworks and detailed information on artists and other project related people. Information regarding people (known as "constituents" can in some cases contain contact information for government employees. TMS maintains names and other unique identifiers in conjunction with other data elements such as gender, race, birth date, age, geographic indicators, personal e-mail address, home address, home phone number, and similar personal information.
1. Describe all information to be included in the system, including personal data.	The system will be used to track all details pertaining to the full life cycle of Art in Architecture projects and manage the National Artist Registry in support of the Art in Architecture program. The system will also support the Fine Arts Program in managing the Fine Arts collection. Data will include descriptive information on artworks and detailed information on artists and other project related people. System will also contain contact information for government employees. The system will maintain names and other unique identifiers in conjunction with other data elements such as gender, race, birth date, age, geographic indicators, personal e-mail address, home address, home phone number, and similar personal information.
1.a. What stage of the life cycle is the system currently in?	Production
2.a. What are the sources of the information in the system?	Data in the system originates/will originate from a variety of sources. • Migrated from legacy systems • Submitted by individuals • Submitted by a third party on behalf of individuals • Entered on behalf of individuals from information gathered from public sources • Information from GSA staff directories
2.b. What GSA files and	Legacy Fine Arts Application and Art in Architecture database files and

databases are used?	GSA staff directory.
2.c. What Federal agencies are providing data for use in the system?	GSA
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?	Artist representatives may submit information on behalf of their clients. Information on artists will be gathered from public sources, such as the Getty's Union List of Artist's Names or Who's Who in American Art.
2.f. What information will be collected from the individual whose record is in the system?	For some, but not all, individuals the following information will be collected: Name Date of birth Place of birth Current address – street address, city, state, zip code Email address Website address Home telephone number Office/studio telephone number Fax number Contact information for gallery or other artist's representative U.S. Citizenship
3.a. How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?	The Artist representatives may submit information on behalf of their clients and we rely on them to provide accurate information. There is no secondary method for verification of accuracy. We grant read only access to the application and ensure that all the GSA servers are hardened based on GSA IT security policies.
3.b. How will data be checked for completeness?	The data is provided by Artist representatives may submit information on behalf of their clients and we rely on them to provide accurate information. Information on artists will be gathered from public sources, such as the Getty's Union List of Artist's Names or Who's Who in American Art. We will coordinate with Artist Representatives and verify along Getty's Union List of Artist's Names or Who's Who in American Art for the completeness of the data on an ongoing basis.
3.c. Is the data current? How do you know?	The date the data is entered/collected will remain associated with the data and updated accordingly. Individuals will be contacted periodically to update/verify their information. If there is no response their record will be marked inactive or deleted.

Question	Explanation/Instructions
4. Are the data elements described in detail and documented? If yes, what is the name of the document?	The data elements are described in the software documentation and in the data dictionary

B. Access to the Data

Question	Explanation/Instructions
1. a. Who will have access to the data in the system?	Only current employees/contractors of the Fine Arts Program and the Art in Architecture program will have access to privacy data: Jennifer Gibson (CO) Kathy Erickson (CO) Mary Margaret Carr (CO) Julie Redwine (CO) William Caine (CO) Kimberly Baker (CO) Nicole Avila (CO)
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.	Personally Identifiable Information will not be released based on FOIA exemption #6
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	The access to the data will follow the GSA policies and procedures. GSA employees who are allowed access to the PBS portal will be allowed read only access non-privacy data, GSA employees hired as part of Fine Arts or Art in Architecture program will be allowed access to privacy data. Only current employees/contractors of the Fine Arts Program and the Art in Architecture program will have access to the privacy data. A current list of these employees follows: Jennifer Gibson (CO) Kathy Erickson (CO) Mary Margaret Carr (CO) Julie Redwine (CO) William Caine (CO) Kimberly Baker (CO) Nicole Avila (CO)
3. Will users have access to all data in the system or will the user's access be restricted? Explain.	All the general users will have read only access to the data. Fine Arts and Art in Architecture program staff will be able to fully access their own privacy data. The application will be hardened to the GSA security policies.

4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?	All the General users will have only read access. The administrators will have the ability to delete and update the records. We will ensure that the auditing has been enabled to track the data. The application will be hardened to the GSA security policies.
5.a. Do other systems share data or have access to data in this system? If yes, explain.	eMuseum is a web-based application that has been implemented on the pilot server along with TMS. eMuseum will retrieve specific fields of information by Mary from the TMS database for display. Mary Margaret Carr at GSA is responsible for determining the fields that are displayed. Presently eMuseum is used internally, not externally at GSA.
5.b. Who will be responsible for protecting the privacy rights of the clients and employees affected by the interface?	Mary Margaret Carr Phone: 202-501-1554 E-mail:Mary.Carr@gsa.gov Organization Title and Correspondence Code: Office of Design and construction (PCAC) Name: Sarah Matin Phone: 202-250-4697 E-mail: sarah.matin@gsa.gov Organization Title and Correspondence Code: Public Buildings Information Technology Services (PB-ITS)
6.a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	None
6.b. How will the data be used by the agency?	The data will be used to track all details pertaining to the full life cycle of Art in Architecture projects and manage the National Artist Registry in support of the Art in Architecture program. The data will also support the Fine Arts Program in managing the Fine Arts collection. Data will provide descriptive information on artworks and detailed information on artists and other project related people. Privacy data about artists will be used to identify potential artists for upcoming commissions and to provide programmatic information on previously awarded commissions.
6.c. Who is responsible for assuring proper use of the data?	Mary Margaret Carr Phone: 202-501-1554 E-mail:Mary.Carr@gsa.gov Organization Title and Correspondence Code: Office of Design and construction (PCAC) Name: Sarah Matin Phone: 202-250-4697 E-mail: sarah.matin@gsa.gov

	Organization Title and Correspondence Code: Public Buildings Information Technology Services (PB-ITS)
6.d. How will the system ensure that agencies only get the information they are entitled to?	The data is not exchanged with other agencies. The data will be internal to GSA only.
7. What is the life expectancy of the data?	The data will be maintained in the TMS database indefinitely.
8. How will the data be disposed of when it is no longer needed?	The data will be deleted in accordance with GSA policies and procedures. We will delete inactive Artist's Registry records in accordance with GSA regulations.

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?	• Name - identification • Date of birth – identification, demographic reporting • Place of birth – identification, commission suitability, demographic reporting • Current address (street address, city, state, zip code) - contact • Email address - contact • Website address – contact, information on body of work • Home telephone number - contact • Office/studio telephone number - contact • Fax number - contact • Contact information for gallery or other artist's representative - contact • U.S. Citizenship – commission suitability
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. We do not add new information about the individuals to the system without approval from the user.
2.d. How will the new data be verified for	The system does not collect or track any new information in

Question	Explanation/Instructions
relevance and accuracy?	the system.
	The initial data is provided by Artist representatives may submit information on behalf of their clients and we rely on them to provide accurate information.
	Information on artists will be gathered from pubic sources, such as the Getty's Union List of Artist's Names or Who's Who in American Art.
	System PMs will coordinate with Artist Representatives and verify along Getty's Union List of Artist's Names or Who's Who in American Art for the completeness of the data on an ongoing basis.
3.a. If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain.	NA
3.b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	NA
4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Data will be retrieved by name and geographic information. Artist's SSN isn't listed as a data element that will be collected.
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?	The general user will have read only access to the system. All the access to the PIA data is audited and records tracked in the system. The system has been hardened according to the GSA policies and standards.

D. Maintenance of Administrative Controls

Question	Explanation/Instructions
1.a. Explain how the system and its use will	Since eligibility for commissions may be determined

ensure equitable treatment of individuals.	based on geographic information every effort will be made to ensure data is accurate and up to date for individuals in those fields.
1.b. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites?	Information is pulled from a central database.
1.c. Explain any possibility of disparate treatment of individuals or groups.	NA
2.a. What are the retention periods of data in this system?	Majority of data will be kept indefinitely, inactive Artist's Registry records may be deleted in accordance with GSA regulations. Records are maintained and disposed according to GSA Policy 1820.1 CIO (Records Maintenance and Disposition System).
2.b. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	This will be documented in the System Standard Operating Procedures document (SOP)
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?	Individuals will be contacted periodically to verify/update their information. If individuals do not respond their records will be inactivated or deleted. This will be documented in the System Standard Operating Procedures document (SOP)
3.a. Is the system using technologies in ways that Federal agencies have not previously employed (e.g. Caller-ID)?	No
3.b. How does the use of this technology affect individuals' privacy?	NA
4.a. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	System will allow identification and location of individual, but not monitoring.
4.b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	System will allow identification and location of individual but not groups.
4.c. What controls will be used to prevent unauthorized monitoring?	These have been documented in the SOP.
5.a. Under which Privacy Act System of Records notice (SOR) does the system operate? Provide number and name.	GSA/PBS-7

5.b. If the system is being modified, will the SOR require amendment or revision? Explain.	If a system modification were to occur, the TMS PM and ISSO would coordinate preparation of a revised SOR with the GSA Privacy Act Officer.