



The Museum System (TMS)

Privacy Impact Assessment

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Chief Privacy Officer. Under the direction of the Senior Agency Official for Privacy (SAOP), the Chief Privacy Officer is responsible for evaluating the PIAs for completeness of privacy related information.

Document Revision History

Date	Description	Version of Template
6/20/2019	TMS PIA initial release of GSA PIA template version 2.4	1.0
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Document purpose

This document contains important details about The Museum System (TMS) information system. The General Services Administration (GSA) Art in Architecture/Fine Arts Program and Design Excellence Program may, in the course of normal business, collect personally identifiable information (“PII”) about artists and participants in the Design Excellence Peer Program. TMS is a fine art focused collections management system that tracks the full life cycle of artworks in the Fine Arts Collection and is used to manage the Art in Architecture commissioning process and the Design Excellence Peer Program.

PII is any information^[1] that can be used to distinguish or trace an individual’s identity like a name, address, or place and date of birth.

GSA uses Privacy Impact Assessments (PIAs) to explain how it collects, uses, secures, and destroys information in ways that protect privacy. This PIA is comprised of sections that reflect GSA’s [privacy policy](#) and [program goals](#). The sections also align to the Fair Information Practice Principles (“FIPPs”), a set of eight precepts that are codified in the Privacy Act of 1974.^[2]

System, Application or Project

The Museum System (TMS)

System, application or project includes information about

Data in the TMS 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

System, application or project includes

Artist and/or Peer representatives may submit information on behalf of their clients.

Information on artists and Design Excellence Peers will be gathered from public sources, such as the Getty’s Union List of Artist’s Names or Who’s Who in American Art.

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
- Confirmation of U.S. Citizenship or permanent resident status (no records kept if artist is not a U.S. Citizen or permanent resident)
- Date and place of death for deceased artists as they are no longer considered active in the program

Overview

The system will be used to track all details pertaining to the full life cycle of Art in Architecture projects, manage the National Artist Registry in support of the Art in Architecture program and manage the Design Excellence Peer Review Program. The system also supports the Fine Arts Program in managing the Fine Arts collection.

The system data includes descriptive information on artworks and detailed information on artists and other program related people (e.g. panelists who review artist submission; tenants of the building; construction project team members (architects); etc.).

The system also contains contact information for government employees who supports the program.

The system maintains names and other unique identifiers in conjunction with other data elements such as birth date, age, geographic indicators, personal e-mail address, home address, home phone number, and similar personal information.

SECTION 1.0 PURPOSE OF COLLECTION

GSA states its purpose and legal authority before collecting PII.

1.1 Why is GSA collecting the information?

The data will be used to track all details pertaining to the full life cycle of Art in Architecture projects, manage the National Artist Registry in support of the Art in Architecture program and manage the Design Excellence Peer Review 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 (e.g. the artist's representative).

Privacy data about artists will be used to identify potential artists for upcoming commissions and to provide programmatic information on previously awarded commissions. Privacy data for

Design Excellence Peers is used to arrange for travel and compensation for participation in Peer Review meetings.

1.2 What legal authority and/or agreements allow GSA to collect the information?

No law mandates that a percentage of federal construction budgets be spent for fine art. The Art in Architecture Program is the result of a policy decision made in January 1963 by GSA administrator Bernard L. Boudin, who had served on the Ad Hoc Committee on Federal Office Space in 1961-62. The committee's report to President Kennedy, included "Guiding Principles for Federal Architecture," which detailed a new quality conscious federal attitude toward architecture. One point, which was omitted from the report because Boudin implemented it prior to the policy's publication, was:

"A modest portion of the cost of each new Federal office building, not to exceed one percent of the total expense, shall be allocated for the purchase of fine arts to be incorporated in the general design. Emphasis should be placed on the work of living American artists, representing all trends of contemporary art, but this practice should not preclude the purchase of works of earlier periods where this would be appropriate. In commissioning the work of living artists, competitions should be encouraged."

Boudin approved a policy of commissioning works of art in public buildings under GSA's jurisdiction, at a cost not to exceed one half of one percent of the construction cost.

The requirement to commission artworks for federal buildings can be found in Chapter 102-77 of the Federal Management Regulations (41 CFR 102-77).

The program has been modified over the years, most recently in 2010 when a requirement was instituted that all artists who want to be considered for any potential GSA commission must be included on the National Artists Registry, which serves as the qualified list of eligible artists; the program continues to commission works of art from living American artists. One half of one percent of the estimated construction cost of new or substantially renovated Federal buildings and U.S. courthouses is allocated for commissioning works of art.

The Art in Architecture Program actively seeks to commission works from the full spectrum of American artists, and strives to promote new media and inventive solutions for public art. GSA has awarded over 400 commissions both to artists with established careers, as well as to artists of local and regional prominence. In support of the program's goal to commission the most talented contemporary American artists to create works for the nation's important new civic buildings, it is necessary to identify those artists. The National Artist Registry offers the opportunity for artists across the country to participate and to be considered for commissions.

The Design Excellence Peer Program is how GSA fulfills the Brooks Act (Public Law 92-582), also known as Qualifications Based Selection (QBS) by appointing private practitioners to participate in the selection of architects and engineers.

1.3 Is the information searchable by a personal identifier, for example a name or Social Security Number? If so, what System of Records Notice(s) apply/applies to the information being collected?

Yes, TMS is searchable by personal identifiers. TMS is registered on the Office of the Federal Register ([link](#)). Its OMB System of Record; System Name: GSA/PBS-7 (The Museum System – TMS); Document Number: 2010-12039

1.4. Has any information collection request (ICR) been submitted to or approved by the Office of Management and Budget (OMB)? If yes, provide the relevant names, OMB control numbers, and expiration dates.

Yes, the [Art in Architecture National Artist Registry Form](#) has been approved by OMB. Its OMB Control Number is 3090-0274 and expiration date is 10/31/2022.

1.5. Has a records retention schedule been approved by the National Archives and Records Administration (NARA)? Explain how long and for what reason the information is retained.

Majority of data will be kept indefinitely, inactive Artist’s Registry records may be deleted in accordance with GSA regulations, per GSA Policy 1820.1 CIO Records Maintenance and Disposition System.

121.1/040 – Significant Art Inventory Records - legal citation: (DAA-121-2015-0001-0007)

This series contains records used in identifying items within the building that are removable or replaceable, or have a significant historical and/or architectural value. For art associated with a building (such as statuary, paintings, and architectural features), records such as inventories, case files, art maintenance records, art appraisals and art restoration documents and related materials are included.

Permanent. Cut off at the end of the fiscal year when the case file is closed, the artifact is destroyed, transferred, or otherwise de-accessioned. Transfer to NARA 15 years after cutoff.

1.6. Are there any privacy risks that relate to the purpose of the collection? If so, how will GSA mitigate these risks?

All the general/eMusuem and public Fine Arts site users only have Read-Only access. Read-Only access does not include access to the TMS data where PII data is stored. The TMS users have the ability to delete and update the TMS records. The TMS data fields are independently managed in accordance with a “business need to know” basis.

The supporting IT infrastructure is deployed with configuration hardening applied, per GSA IT Security Policy requirements.

SECTION 2.0 OPENNESS AND TRANSPARENCY

GSA is open and transparent. It notifies individuals of the PII it collects and how it protects, uses and shares it. It provides straightforward ways for individuals to learn about how GSA handles PII.

2.1 Will individuals be given notice prior to the collection and/or sharing of personal information about themselves? If not, please explain.

GSA form 7437 is available electronically at www.gsa.gov/artinarchitecture. Artists may, but are not required to submit the form electronically. Most artists send the form and supporting information via e-mail but some provide the information on a compact disc. Once received, the information from the form, as well as from the artist's resume, is entered into an electronic database to provide quick and thorough response to questions regarding artists and art works and to permit the compilation of the competitive field of artists to be considered for a particular commission.

2.2 Are there any privacy risks for this system that relate to openness and transparency? If so, how will GSA mitigate these risks?

No. No one outside of GSA has direct access to the system. Instead, any information entered into TMS is reviewed and confirmed by program staff during the commissioning process.

SECTION 3.0 DATA MINIMIZATION

GSA limits the collection of PII to what is needed to accomplish the stated purpose for its collection. GSA keeps PII only as long as needed to fulfill that purpose.

3.1 Whose information is included in the system, application or project?

The TMS dataset includes descriptive, detailed information on artists, Design Excellence Peers and other program 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 birth date, age, geographic indicators, personal e-mail address, home address, home phone number, and similar personal information.

3.2 What PII will the system, application or project include?

For some, but not all, individuals the following information is 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 or permanent residence status confirmation

3.3 Why is the collection and use of the PII necessary to the system, application or project?

Data will provide descriptive information on artworks and detailed information on artists and other program 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, for example in response to Congressional inquiries.

3.4 Will the system, application or project create or aggregate new data about the individual? If so, how will this data be maintained and used?

No - the system allows users to generate ad hoc reports but does not create any new information about the constituents. TMS users who have access to their fields in the system have the ability to print it out.

3.5 What protections exist to protect the consolidated data and prevent unauthorized access?

The general TMS user only has read-only access to the eMuseum website, via the internal GSA PBS Portal. The TMS administrators have the ability to delete and update

the records, via a separate access point to the TMS data. System auditing has been enabled to track the data changes. All access to the PII data is audited and records tracked in the system. The system has been hardened according to the GSA policies and IT standards.

Only selected fields can be updated, no PII is in eMusuem.

3.6 Will the system monitor the public, GSA employees or contractors?

No.

3.7 What kinds of report(s) can be produced on individuals?

Ad hoc reports can be generated by authorized users, for specific data fields.

3.8 Will the data included in any report(s) be de-identified? If so, what process(es) will be used to aggregate or de-identify the data?

No.

3.9 Are there any privacy risks for this system that relate to data minimization? If so, how will GSA mitigate these risks?

No. The Program recently reviewed its PII inventory and has deleted demographic information that it no longer has a business need to maintain, decreasing the potential risk.

SECTION 4.0 LIMITS ON USES AND SHARING OF INFORMATION

GSA publishes a notice about how it plans to use and share any PII it collects. GSA only shares PII in ways that are compatible with the notice or as stated in the Privacy Act.

4.1 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. The system only maintains information necessary to confirm an artist is eligible to participate in the program and/or receive a commission.

4.2 Will GSA share any of the information with other individuals, Federal and/or state agencies, or private sector organizations? If so, how will GSA share the information?

The data is not exchanged with other agencies. The public website on gsa.gov only provides publicly available information. All PII data within TMS, is maintained internal to GSA network.

4.3 Is the information collected directly from the individual or is it taken from another source? If so, what is the other source(s)?

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
- Legacy Fine Arts Application and Art in Architecture database files and GSA staff directory.
- GSA/GOVT-9 [System for Award Management \(SAM\)](#).

4.4 Will the system, application or project interact with other systems, applications or projects, either within or outside of GSA? If so, who, how and is a formal agreement(s) in place?

No

4.5 Are there any privacy risks for this system, application or project that relate to use limitation? If so, how will GSA mitigate these risks?

No. If an artist is selected for a commission they are responsible for completing a SAM registry.

SECTION 5.0 DATA QUALITY AND INTEGRITY

GSA makes reasonable efforts to ensure that all PII it maintains is accurate, relevant, timely, and complete.

5.1 How will the information collected be verified for accuracy and completeness?

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
- Legacy Fine Arts Application and Art in Architecture database files and GSA staff directory.
- Artist representatives may submit information on behalf of their clients.

The Art in Architecture program personnel coordinate with Artist Representatives and verify along Getty's Union List of Artists' Names or Who's Who in American Art for the completeness of the data on an ongoing basis.

5.2 Are there any privacy risks for individuals whose information is collected or used that relate to data quality and integrity? If so, how will GSA mitigate these risks?

No. 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.

SECTION 6.0 SECURITY

GSA protects PII from loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.

6.1 Who or what will have access to the data in the system, application or project? What is the authorization process to gain access?

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. All TMS administrator's remote access is approved and documented by the TMS PM and ISSO, following the TMS Remote Access procedures.

6.2 Has GSA completed a system security plan for the information system(s) or application?

The Museum System (TMS) is classified as a minor application (sub-system), within the Information TechOps Technology (TechOps) General Support System (GSS) security boundary. The TechOps GSS was issued a GSA ISCM Ongoing Authorization on 4/7/2017.

6.3 How will the system or application be secured from a physical, technological, and managerial perspective?

The TMS information system is maintained within GSA internal Wide Area Network (WAN) and within the Public Buildings Information Technology Services (PB-ITS) Information Technology (TechOps) General Support System (GSS) Security boundary. The PB-ITS Project Manager (PM) and TechOps Information System Security Officer (ISSO) ensure all GSA IT Security Policies are followed and/or performed by the supporting information system's operational personnel.

6.4 Are there mechanisms in place to identify suspected or confirmed security incidents and breaches of PII? If so, what are they?

All PMO and TechOps staff members follow the policies and procedures defined by the GSA IT Security Procedural Guide: Handling IT Security Incidents CIO-IT Security-01-02 document. Per those procedures, TechOps will submit an Incident Reporting Ticket and/or Form to the appropriate parties and will work with GSA OCISO to investigate and resolve/remediate the issue. Additional information related to the policies and procedures for incident response can be found in the TechOps SSP documentation.

Employment of automated mechanisms for security incident reporting will be accomplished by reporting of incidents through the GSA IT Service Desk (helpdesk) ticketing system and subsequent reporting by the OCISO to the US-CERT through their Security Operations Center (SOC) portal.

All further incident reporting procedures between Agencies are detailed through interagency agreements (MOU or Communications Plan) and ongoing operational need to meet incident response.

TMS implements IR-6 controls for TMS users and vendors in conjunction with TechOps standing controls.

6.5 Are there any privacy risks for this system, application or project that relate to security? If so, how will GSA mitigate these risks?

Security risks including PII related incidents are mitigated by Standard NIST 800-52R4

security controls implemented on the TMS system. The TMS system is deployed on a standard TechOps hardened based system, the system including the TMS application is then certified by security vulnerability scans and if any risk is identified corrective actions are implemented or identified before TMS returns as a Production system. Additionally the TMS system follows all PII GSA policy requirements.

SECTION 7.0 INDIVIDUAL PARTICIPATION

GSA provides individuals the ability to access their PII and to correct or amend it if it is inaccurate. If GSA exempts a system or program from access, amendment and other provisions of the Privacy Act, it notifies the public of that exemption.

7.1 What opportunities are available for individuals to consent to uses, decline to provide information or opt out of providing information? If no opportunities exist to consent, decline or opt out, please explain.

The Artist representatives may submit information on behalf of their clients and the Art in Architecture commission personnel rely on them to provide accurate information.

The Art in Architecture program personnel will coordinate with the Artist and/or the 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. 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.

7.2 What procedures allow individuals to access their information?

TMS does not allow for individuals to access the PII data within the information system directly. However, the Artist and/or the Artist representatives may submit information on behalf of their clients and the Art in Architecture commission personnel rely on them to provide accurate information.

Individuals will be contacted periodically to update/verify their information. If there is no response their record will be marked inactive or deleted.

7.3 Can individuals amend information about themselves? If so, how?

The Art in Architecture commission personnel will coordinate with the Artist and/or the Artist Representatives and verify along Getty's Union List of Artists' Names or Who's Who in

American Art for the completeness of the data on an ongoing basis. 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.

TMS is registered on the Office of the Federal Register, for addressing the Privacy Act request process.

7.4 Are there any privacy risks for this system, application or project that relate to individual participation? If so, how will GSA mitigate these risks?

No. The TMS system allows only authorized staff to add, alter, modify, and delete information records. TMS “Artist” PII information is based on external sources, and verified on a periodic cycle to determine the information is correct and still valid.

SECTION 8.0 AWARENESS AND TRAINING

GSA trains its personnel to handle and protect PII properly.

8.1 Describe what privacy training is provided to users, either generally or specifically relevant to the system, application or project.

GSA requires all staff to complete privacy and security training. Specific training on information handling procedures and sensitivity of information may also be offered. All TMS personnel are GSA or contractor employees that are required to certify GSA PII training requirements annually.

8.2 Are there any privacy risks for this system, application or project that relate to awareness and training? If so, how will GSA mitigate these risks?

GSA’s annual PII and data/records handling training personnel certification provides acceptable risk mitigation for TMS.

SECTION 9.0 ACCOUNTABILITY AND AUDITING

GSA’s Privacy Program is designed to make the agency accountable for complying with the Fair Information Practice Principles. GSA regularly checks that it is meeting the requirements and takes appropriate action if it is not.

9.1 How does the system, application or project ensure that the information is used in accordance with the stated practices in this PIA?

The TMS information system provides audit information based on NIST 800-52R4 AC and AU security controls. As part of TMS’s Statement of Work (SOW) with the system’s developer, a Non Disclosure Agreement (NDA) is in-place with the vendor. As part of the

PB-ITS TechOps SOW with the GSS O&M vendor, an NDA is in-place with the vendor. Annually the PB-ITS PM performs a Remote Access audit of the TMS privileged users, to ensure their Need to Know/Need to Access is required. Annually the PB-ITS TechOps GSS performs a Remote Access audit and ensures all identified OS System Administrators access is required.

9.2 Are there any privacy risks for this system, application or project that relate to accountability and auditing? If so, how will GSA mitigate these risks?

No accountability or system auditing privacy risks have been identified for the TMS information system.

[1] OMB Memorandum [Preparing for and Responding to a Breach of Personally Identifiable Information](#) (OMB M-17-12)

defines PII as: “information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.” The memorandum notes that “because there are many different types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad.”

[2] Privacy Act of 1974, 5 U.S.C. § 552a, as amended.