



Privacy Impact Assessment Update
for the
Office for Civil Rights and Civil Liberties
Entellitrak

August 23, 2010

Contact Point

Jackie Mayi

Complaints Manager

Office for Civil Rights and Civil Liberties

U.S. Department of Homeland Security

(202) 357-8178

Reviewing Official

Mary Ellen Callahan

Chief Privacy Officer

Department of Homeland Security

(703) 235-0780



Abstract

The Offices for Civil Rights and Civil Liberties (CRCL) for the Department of Homeland Security (DHS) and Transportation Security Administration (TSA) have established a new database called Entellitrak which is an enterprise tracking system that has been configured to track, search, and report on complaints data. It is a database developed to respond to allegations of abuses of civil rights, civil liberties, and religious, racial, and ethnic profiling by department employees and officials. Entellitrak will replace the legacy system CRCL Matters with all CRCL Matters data migrating onto Entellitrak in the transition. This Privacy Impact Assessment (PIA) is being conducted because Entellitrak collects and stores personally identifiable information (PII).

Introduction

Entellitrak will serve as the replacement system for CRCL Matters.¹ The Entellitrak system will fulfill the same business requirements as CRCL Matters; and, as with CRCL Matters, Entellitrak will serve as the database used to respond to allegations of abuses of civil rights, civil liberties, and religious, racial, and ethnic profiling by department employees and officials for Headquarters (HQ) as well as TSA. While the process for collection and data capture will remain the same, the Entellitrak system will provide end users with enhanced processing and reporting capabilities, such as running reports using various filters, storing canned reports, exporting search results to various file types, and saving templates forms and letters.

Reason for the PIA Update

This PIA Update to the CRCL Matters PIA is necessary because CRCL is transitioning from CRCL Matters to Entellitrak as the sole complaints tracking system in order to improve base functionality and processing capability. This PIA Update serves as notice of the system name change, a change in application platforms, and most significantly, TSA's intent to use Entellitrak to track its respective component complaints. With TSA's use of Entellitrak, the volume of PII collected may increase; however, type of information collected, retention, sharing, and individual access will remain unchanged in this system.

Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases there may be no changes and indicate as such.

The System and the Information Collected and Stored within the System

Describe how this update affects the amount and type of personally identifiable information collected by the program or system, and how the update complements the previously articulated purpose of the program.

TSA will be using the same instance of Entellitrak as HQ. While this change may increase the amount of PII collected, the type of information will remain the same. To mitigate risks with this increase in collection, the application is designed to be role-based; therefore, each user will be able to view only data pertaining to its respective cases within its component. There will be no cross-component access or

¹ See CRCL Matters PIA, at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_dhs_crclmatters.pdf



viewing capability. This functionality will reduce incidents of unauthorized disclosure and preserve the integrity of the information within the system.

Uses of the System and the Information

Describe how the uses of the personally identifiable information have changed with this update and whether any privacy risks exist as associated with such changes.

The uses of the PII have not changed with this update.

Retention

Describe whether retention schedules have changed or if the system now has an approved NARA schedule.

The retention schedule has not changed with this update, and the NARA approved schedule remains in effect.

Internal Sharing and Disclosure

Describe how the internal sharing and disclosure have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

No changes have been made related to the internal sharing and disclosure process.

External Sharing and Disclosure

Describe how the external sharing and disclosure have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

No changes have been made related to the external sharing and disclosure process.

Notice

Describe whether additional notice is required to describe new collections, uses, sharing, or retention of the data and how that has or will be done.

As with CRCL Matters, notice is provided through Civil Rights and Civil Liberties (CRCL) Matters System of Records Notice, DHS/CRCL-001 (69 FR 70464, December 6, 2004).

Individual Access, Redress, and Correction

Describe how access, redress, and correction have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.



No changes have been made related to how individuals can access, redress, and correct their information.

Technical Access and Security

Describe how the technical access and security have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

Technical access and security have not changed with this update.

Technology

Describe how the technology has changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

The legacy application, CRCL Matters, was based on the Appian platform, which uses proprietary code. Because of the proprietary nature of the application, it is significantly more costly to maintain and less flexible in terms of accommodating new and emerging requirements. The new application, Entellitrak, is based on Java, and the vendor, MicroPact, has a large presence in the federal government with its suite of data tracking software (includes iComplaints and eVersity). In terms of privacy risks, the DHS OCIO will perform full scans of the application to ensure that any vulnerabilities are identified and mitigated. Further, the infrastructure upon which Entellitrak is hosted has received its certification and accreditation, and any risks will be documented and addressed appropriately before the application can receive its authority to operate.

Responsible Official

Jackie Mayi
Complaints Manager
Office for Civil Rights and Civil Liberties
U.S. Department of Homeland Security
(202) 357-8178

Approval Signature

Original signed copy on file with the DHS Privacy Office

Mary Ellen Callahan
Chief Privacy Officer
Department of Homeland Security