



**Privacy Impact Assessment Update
for the**

Department Freedom of Information Act and Privacy Act Records Program

DHS/PRIV/PIA-028(a)

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Abstract

The Department of Homeland Security (DHS) Privacy Office is publishing this update to the current Privacy Impact Assessment (PIA), DHS/ALL/PIA-028,¹ which outlines the risks presented by the use of personally identifiable information (PII) in the various Freedom of Information Act (FOIA) and Privacy Act (PA) processes and systems employed by DHS. This update introduces the use of a FOIA software application used for tracking FOIA requests.

Introduction

The DHS Freedom of Information Act (FOIA) and Privacy Act (PA) Disclosure section of the Department of Homeland Security (DHS) Privacy Office, exists to promote transparency of Department operations. Through this approach, the DHS Privacy Office centralizes FOIA and PA operations to provide policy and programmatic oversight, and support implementation across the Department and to respond to individual requests for information under the FOIA and PA. The software implementation will not significantly change the processing of a FOIA request. The request received will be scanned into the DHS FOIA shared drive, data necessary to track and respond to the request will be entered into the FOIA processing software, and this information will be aggregated in a database for reporting purposes. The only deviation from the current process will be the database aggregation. Previously data such as the name, address, date of request, and the records sought, populated a spreadsheet. Following the implementation of the FOIA software, the same data is entered in to the FOIA software database for more accurate tracking and accounting. The software will allow components within DHS to tally and sort the data for Departmental reports. This accountability will provide for more accurate reporting to the Department of Justice, as required by statute.

The DHS FOIA Office will be deploying this technology in response to FOIA requests received by the Department. In the event other DHS component FOIA offices adopt this software, their user rights and data will remain independent from the DHS FOIA Office. Each individual software system will operate exclusively to respond to FOIA requests received by the respective offices.

Reason for the PIA Update

The purpose of this update is to introduce new Commercial Off-the-Shelf (COTS) software that enhances the ability of FOIA offices within DHS to receive, track, distribute, and respond to FOIA and PA requests. Individuals submit FOIA and PA requests to the Department

¹ http://www.dhs.gov/xlibrary/assets/privacy/privacy-pia_dhs-foia-and-pa.pdf



through various communications methods including U.S. mail, facsimile, e-mail, or via commercial shipping method. Once received, the Department's FOIA and PA staff record the request into the software database and then tasks it to the appropriate program office to conduct a search for the requested records.

When an individual submits a request for records, PII provided by the requester is logged into the FOIA tracking system and is used to assist the program office in conducting a search for the records. Following the logging in of requester data, a request for a search of the requested records is emailed to the responsive program office(s). If records responsive to the request exist, they are forwarded to the DHS FOIA Office for analysis to determine if they may be released, and are enclosed with a letter to the requester itemizing the records identifying what, if any, exemptions are claimed to withhold portions of the records. When no records exist that are responsive to the request, the DHS FOIA Office sends a letter to the requester advising them accordingly.

Privacy Impact Analysis

The System and the Information Collected and Stored within the System

The information that will be captured by this new software includes the requester name, requester address, date of request, and the records sought. This information is identical to the information that is currently captured in the system.

Uses of the System and the Information

The use of PII will not change following implementation of the new software.

Retention

The retention schedule will not change, as FOIA records will remain under General Records Schedule 14.

Internal Sharing and Disclosure

Internal sharing and disclosure will remain the same under the new software. The DHS FOIA Office will be deploying this technology in response to FOIA requests received by the Department.

In the event other DHS component FOIA offices adopt this software, their user rights and data will remain independent from the DHS FOIA Office. Each individual software system will operate exclusively to respond to FOIA requests received by the respective offices.

Records responsive to a request that involve multiple DHS components are shared via DHS email exchange and SharePoint, as with the current process. Access to these records



requires a login and password in SharePoint and access to the folder is assigned on a need to know basis.

External Sharing and Disclosure

External sharing will remain the same under the new software.

Notice

No additional notice is required to collect, maintain or share PII.

Individual Access, Redress, and Correction

There are no changes in the method of access, redress, and correction. The processes are outlined in the original PIA.²

Technical Access and Security

Access to the information will be determined through specified role-based permissions, as authorized by the specific system owner. These role-based access controls are based upon the principle of least privilege. The principal of least privilege states that a user may only have the minimum privileges to perform their assigned tasks. A system user, functioning as a supervisor, may assign specific rights to other users to follow the case. For example, a supervisor who receives correspondence from a requester may choose to allow successive individuals to view the document, but not modify or delete the contents. When doing so, any access rights to the document must be specifically assigned to an individual user who receives the action. The implementation of this FOIA software will result in better data integrity and more data security.

² http://www.dhs.gov/xlibrary/assets/privacy/privacy-pia_dhs-foia-and-pa.pdf



Technology

The software application allows users to enter data, through scanning and manual typing. Individuals provide information to the Department when submitting FOIA and/or PA requests. The Department receives requests for records via U.S. mail, electronic mail, facsimile, and various commercial shipping methods.. This information is entered into the FOIA software database at the Department depending on where it was received. For example, at the DHS FOIA and PA Office, information is entered into FOIA database via (1) scanning original documents into the FOIA shared drive an Adobe PDF file; (2) typing the information received (manually) into the FOIA software database; and (3) copying information received electronically and pasting the data into the appropriate fields of the FOIA software database. This information is secured on DHS servers.

Responsible Official

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Approval Signature

[Original signed copy on file with the DHS Privacy Office]

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