



## U.S. Department of the Interior PRIVACY IMPACT ASSESSMENT

### Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the [DOI PIA Guide](#) for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

**Name of Project:** Lands & Realty Authorizations Module (LRAM)

**Date:** October 31, 2022

**Bureau/Office:** Bureau of Land Management/Branch of Project Management

**Bureau/Office Contact Title:** Bureau Associate Privacy Officer

**Point of Contact:**

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### Section 1. General System Information

#### A. Is a full PIA required?

- Yes, information is collected from or maintained on
- Members of the general public
  - Federal personnel and/or Federal contractors
  - Volunteers
  - All

No: *Information is NOT collected, maintained, or used that is identifiable to the individual in this system. Only sections 1 and 5 of this form are required to be completed.*

#### B. What is the purpose of the system?

The Lands & Realty Authorizations Module (LRAM) is an application within the Use Authorization System (UAS) which generates and manages land and realty actions and billing information, including Communication Site Rental Calculations (CSRC) for all rights-of-way (ROW) and other public lands and realty authorizations. LRAM fully integrates the billing process with the Collections and Billings System (CBS) by supplying billing data to the CBS



database. LRAM receives customer name, authorization issue and expiration dates, case types, and action codes from Legacy Rehost 2000 (LR2000).

**C. What is the legal authority?**

- Federal Land Policy Management Act of Oct. 1, 1976 (43 U.S.C. 1701, 1713)
- Mineral Leasing Act of 1920, as amended (30 U.S.C. 185)
- 43 CFR Part 2800—Rights-Of-Way, Principles and Procedures; Rev. Oct. 1, 2003
- 43 CFR Part 2810—Tramroads and Logging Roads; Rev. Oct. 1, 2003
- 43 CFR Part 2880—Rights-Of-Way Under the Mineral Leasing Act; Rev. Oct. 1, 2003
- 43 CFR Part 2910—Leases; Rev. Oct. 1, 2003
- 43 CFR Part 2920—Leases, Permits and Easements; Rev. Oct. 1, 2003

**D. Why is this PIA being completed or modified?**

- New Information System
- New Electronic Collection
- Existing Information System under Periodic Review
- Merging of Systems
- Significantly Modified Information System
- Conversion from Paper to Electronic Records
- Retiring or Decommissioning a System
- Other: *Describe*

**E. Is this information system registered in CSAM?**

Yes:

010-000000164; System Security and Privacy Plan for Lands & Realty Authorizations Module

No

**F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.**

Subsystem Name	Purpose	Contains PII (Yes/No)	Describe If Yes, provide a description.
None			

**G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?**

Yes



LRAM currently operates under the existing Privacy Act systems of records notices (SORNs):

INTERIOR/LLM-32, Land & Minerals Authorization Tracking System; 56 FR 5014, February 7, 1991; Modification published 73 FR 17376, April 1, 2008 and 86 FR 50156, September 7, 2021. INTERIOR/LLM-32 is currently being updated to combine three previously published SORNs, INTERIOR/BLM-3, Mineral Lease Management; INTERIOR/BLM-4, Coal Lease Data System; and INTERIOR/BLM-6, Mineral Surveyor Appointment File, and to incorporate new Federal government-wide requirements in accordance with OMB Circular A-108. This consolidated notice will be published under a new umbrella system of records name, INTERIOR/BLM-32, General Land Use.

INTERIOR/DOI-86, Accounts Receivable: FBMS, 73 FR 43772, July 28, 2008; Modification published 86 FR 50156, September 7, 2021. CBS sends collection and billing files to FBMS to ensure that all collections, bills, adjustments, and reversals posted in CBS are also posted in the FBMS ledger of record for the purpose of keeping the two systems in sync.

DOI SORNs may be viewed on the DOI SORN website at <https://www.doi.gov/privacy/sorn>.

No

**H. Does this information system or electronic collection require an OMB Control Number?**

Yes

LRAM leverages the LR2000 application and its documentation as such under their OMB number. OMB Control Number 1004-0009, Land Use Application and Permit (43 CFR part 2920), Expiration 30 Jun 2023

- Form 2820-1, Land Use Application and Permit (State and Local Governments)
- Form 2929-1, Land Use Application and Permit (Individuals)
- Form 2920-1, Land Use Application and Permit (Private Sector/Complex)
- Form 2920-1, Land Use Application and Permit (Private Sector/Typical)

No

**Section 2. Summary of System Data**

**A. What PII will be collected? Indicate all that apply.**

- Name
- Financial Information
- Personal Email Address
- Home Telephone Number
- Mailing/Home Address
- Personal Cell Telephone Number
- Other



LRAM contains the names, addresses, and telephone numbers for individuals, government entities, entrepreneurs, and other business entities holding permits, leases, or other authorizations to use public lands provided to LR2000 and shared with LRAM. Personal mailing/home address is used to facilitate courtesy statements and billing notices.

LRAM shares authorization number, customer name, customer address and billing amount with CBS for the purpose of creating billing invoices and receipt processing. CBS allows for credit card or electronic funds transfer (EFT) Automated Clearing House (ACH) transactions as form of payment. If a customer chooses to pay by credit card, they are required to provide credit card information which contains cardholder name, credit card type, credit card number and expiration date, telephone number. BLM provides information that banking institutions require to process electronic payments. The PII in CBS is used for the purpose of recording customer billing and receipt of payment information, and only collects the minimum PII necessary to process billing and receipt of payment for LRAM. CBS sends collection and billing files to FBMS to ensure that all collections, bills, adjustments and reversals posted in CBS are also posted in the FBMS ledger of record, and the two systems are kept in sync.

The information provided by LR2000 to LRAM includes the name, address and telephone number of the customer, authorization issue and expiration dates, case types, and action codes.

BLM employees and contractors working on behalf of BLM request access to LRAM through the BLM Application Support System (BASS) and have multiple options for logging into the BASS. If physically connected to a DOI network, BLM approved users can use a Smart Card, Active Directory (AD), BASS password and/or a Single Sign-On (SSO) login. Authenticating the Smart Card allows BLM users to log into BASS using their Smart Card and PIN via the two-factor authentication process to access the user's approved applications. AD BASS login attempts require an AD User ID and Password to access BASS. This PII may include name, email address, telephone number, network user ID and password, This PII is used to grant, modify, or remove user access within LRAM through BASS.

**B. What is the source for the PII collected? Indicate all that apply.**

- Individual
- Federal agency
- Tribal agency
- Local agency
- DOI records
- Third party source
- State agency
- Other: LRAM interfaces with the LR2000 system. The information provided by LR2000 comes from the individual or from a hard copy application submitted by the individual. That information is entered into the LR2000 system and copied from there into the LRAM.

**C. How will the information be collected? Indicate all that apply.**



- Paper Format
- Email
- Face-to-Face Contact
- Web site
- Fax
- Telephone Interview
- Information Shared Between Systems: LRAM pulls case information from the LR2000 system and communication use rent amounts from the Communication Site Rental Calculation system (CSRC). LRAM then sends billing data to CBS which in turn, sends the corresponding CBS bill number and payment receipt data back to LRAM. The CBS data provides BLM employees with a centralized source for financial, collections, and billings information.

Other: *Describe*

**D. What is the intended use of the PII collected?**

The PII collected is used to process land and realty actions by providing Bureau employees with a centralized source of use authorizations (permits, leases, and ROWs). BLM field staff also use PII maintained within LRAM to generate courtesy statements, requesting the initial acreage rent, and to generate subsequent annual bills to invoice for rents. The PII is also used to create billing information, including CSRC for all ROW and other public lands and realty authorizations. The LRAM module calculates the yearly bills and communicates this amount by securely inserting them into CBS. The billing process is fully integrated with CBS by supplying billing data to the CBS database. LRAM receives customer name, authorization issue and expiration dates, case types, and action codes from LR2000. The transactional side of the system captures, analyzes, edits, and commits the authorization and billing data to permanent records.

**E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.**

Within the Bureau/Office:

LRAM interfaces to the LR2000 system. The information provided by LR2000 to LRAM includes the name, address, and telephone number of the customer, which comes from the individual or from a hard copy application submitted by the individual. That information is entered into the LR2000 system and copied from there into the LRAM. Additionally, information is shared via the system across BLM Field Offices and the authorized staff responsible for collecting and verifying application data and using the data for the purposes of issuing and monitoring permits and leases, billing, and auditing customers, and corresponding with customers related to permits, leases, rental bills, and audits.

Other Bureaus/Offices: *Describe the bureau/office and how the data will be used.*

Other Federal Agencies: *Describe the federal agency and how the data will be used.*



Tribal, State or Local Agencies: *Describe the Tribal, state or local agencies and how the data will be used.*

Contractor: *Describe the contractor and how the data will be used.*

Contractors perform maintenance and enhancements on the system and provide customer support to BLM personnel. The data is used as part of the routine operations and maintenance to validate system performance. Contractors do not have access to PII stored on the system.

Other Third-Party Sources: *Describe the third-party source and how the data will be used.*

**F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?**

Yes:

Individuals voluntarily provide information when applying to use, lease or permit on federally managed lands when they complete and submit applications. Within the Notices section of the Land Use Application and Permit forms, a statement is provided which clearly states the submission of the requested information is necessary to obtain or retain a benefit. Failure to submit all requested information or to complete the form may result in delay or preclude the BLM's acceptance of the applicant's form. The LRAM information collected from the Land Use Application and Permit form is obtained for the purpose of generating and managing land and realty actions and billing information, including CSRC for all ROW and other public lands and realty authorizations. If the information is not provided the application process cannot be completed. LRAM contains the names, addresses, and telephone numbers for individuals, government entities, entrepreneurs, and other business entities holding permits, leases, or other authorizations to use public lands provided to LR2000 and shared with LRAM. The LR2000 system contains the names, addresses, interest relationships and percent interest for individuals, government entities, entrepreneurs, and other business entities holding authorizations.

No: *State the reason why individuals cannot object or why individuals cannot give or withhold their consent.*

**G. What information is provided to an individual when asked to provide PII data? Indicate all that apply.**

Privacy Act Statement:

The BLM forms identified in 1.H above contain a Privacy Act statement.

Privacy Notice:



Notice is also provided through the publication of this privacy impact assessment and the INTERIOR/LLM-32 Land & Minerals Authorization Tracking System; 56 FR 5014, February 7, 1991; Modifications published 73 FR 17376, April 1, 2008 and 86 FR 50156, September 7, 2021 and INTERIOR/DOI-86, Accounts Receivable: FBMS, 73 FR 43772, July 28, 2008; Modification published 86 FR 50156, September 7, 2021 system of records notices, which may be viewed at the DOI PIA website at <https://www.doi.gov/privacy/PIA>, and DOI SORN website at <https://www.doi.gov/privacy/SORN>.

Other:

Users of LRAM are presented with a DOI security warning banner that informs them they are accessing a DOI system, that they are subject to being monitored, and there is no expectation of privacy during use of the system. Also, the BLM Electronic Forms site, where applicable forms are available for download, provides a hyperlink to the DOI Privacy Policy page.

**H. How will the data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).**

A unique identifier is assigned to all customer records and is used to expedite processing of information. Information can be retrieved with either the unique identifier or the name of the customers.

**I. Will reports be produced on individuals?**

Yes

The following system-generated reports are produced from LRAM for the purposes indicated in the table below.

<b>UAS-LRAM REPORTS</b>			
<b>Report</b>	<b>Privacy Information</b>	<b>Use/Purpose</b>	<b>Accessed by</b>
Authorization by Customer	Holder/Customer name	Document ROW authorizations	BLM LRAM authorized employees
Authorization Bill Summary	Holder/Customer name, Care of name, Billee name	Document ROW authorizations	BLM LRAM authorized employees
Authorization Data Details	Holder/Customer name, Holder/Customer address, Billee name	Document ROW authorizations	BLM LRAM authorized employees
Authorization Expiration	Holder/Customer name	Document ROW authorizations	BLM LRAM authorized employees
Authorization Next Bill Date	Holder/Customer name	Document ROW authorizations	BLM LRAM authorized employees



<b>UAS-LRAM REPORTS</b>			
<b>Report</b>	<b>Privacy Information</b>	<b>Use/Purpose</b>	<b>Accessed by</b>
Authorization Next Bill Date by Billing Association	Holder/Customer name	Document ROW authorizations	BLM LRAM authorized employees
Authorization Status	Holder/Customer name	Document ROW authorizations	BLM LRAM authorized employees
Customer Report (By Customer)	Holder/Customer name, Holder/Customer address	Document ROW authorizations	BLM LRAM authorized employees
Customer Report (By Field Office)	Holder/Customer name, Holder/Customer address	Document ROW authorizations	BLM LRAM authorized employees
Total Billed Amount by Customer	Holder/Customer name	Document ROW authorizations	BLM LRAM authorized employees

No

### Section 3. Attributes of System Data

#### A. How will data collected from sources other than DOI records be verified for accuracy?

It is the responsibility of the customer completing the application to provide accurate information at initial point of collection. BLM Field Office staff verifies accuracy of data extracted from application forms provided by the customers before it is entered into LRAM. Other data will be verified through discussion with the customer.

#### B. How will data be checked for completeness?

It is the responsibility of the customer completing the application to provide accurate information at initial point of collection. BLM Field Office staff verifies completeness of data extracted from application forms before it is entered into LRAM. Other data will be checked for completeness through discussion with the customer. The application has also implemented business rules that define a complete customer record. These rules are enforced during creation, and when performing updates to the record.

#### C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

Permits, leases, applications, bills, and correspondence are sent to the customers regularly and periodic telephone and face-to-face contacts are made with the customers. Further, it is also the



responsibility of the customer to report any changes regarding their information. BLM Field Office staff are responsible for entering assignments and data updates received from customers into LRAM records in a timely manner.

**D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.**

The retention period set forth by National Archives and Records Administration (NARA) for the records within the LRAM system are Permanent. The disposition authority states to “transfer a copy of the master to NARA upon approval of this schedule, along with the technical documentation in accordance with 36 CFR 1235.44-50. Thereafter, transfer a copy every 5 years, along with the current technical documentation.”

The associated records retention schedule for the records maintained within the LRAM system are covered by DRS/GRS/BLM Combined Records Schedule under disposition authority N1-049-09-15. The LRAM system records are under Schedule 4/15d, Lands and Realty Authorizations Module (LRAM) and 4/15d(1), Master File. The content in LRAM generates and manages land and realty action records and billing information for all Rights-of-Way and other public lands and realty authorizations. The system includes special use authorizations, leases, permits, and communication site rental calculations. LRAM receives customer name, authorization issue and expiration dates, case types, and action codes from LR2000.

**E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?**

Retention of the records in LRAM is permanent and documented in the Departmental Records Schedule/General Records Schedule/BLM Combined Records Schedule under Schedule 4/15d and 4/15d(1). Permanent records are never destroyed and are always identified for transfer to NARA at a specific time after cutoff. Permanent records are transferred to the Federal Records Center (FRC) and then later transferred by the FRC to National Archives during NARA’s annual move process. Permanent records may be transferred directly to the National Archives if they have met their disposition. Disposition instructions for LRAM records are to transfer a copy of the master to NARA upon approval of this schedule, along with the technical documentation in accordance with 36 CFR 1235.44-50. Thereafter, transfer a copy every 5 years, along with the current technical documentation.

**F. Briefly describe privacy risks and how information handling practices at each stage of the “information lifecycle” (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.**

There is a privacy risk to individual’s data collected, processed, and maintained within the LRAM system due to the amount and nature of the data such as name, address and financial information that may be received from individuals. LRAM has undergone a formal Assessment and Authorization for issuance of an authority to operate in accordance with the Federal Information Security Modernization Act (FISMA) and National Institute of Standards and Technology (NIST) guidelines. LRAM has been rated as a moderate system requiring strict



security and privacy controls to protect the confidentiality, integrity, and availability of data in the system. As part of the continuous monitoring program, continuous auditing will occur on the system to identify and respond to potential impacts to the PII collected and used within the system.

Collection occurs in the field office by BLM staff as customers submit a Land Use Application and Permit form for approval of land use. This risk is mitigated through management, operational and technical controls that have been put into place to protect the confidentiality, integrity, and availability of LRAM system data.

Use of the information involves securely pulling the collected data from the LR2000 application. This information is used as the starting point for setting up the case for ongoing billing by the LRAM application. The LRAM module calculates the yearly bills and communicates this amount by securely inserting them into the CBS database utilizing their BxInterface tables. The CBS system then ages and collects the debt. The data used is limited to the minimal amount needed to meet stated purpose of the initial collection. Personnel security controls are implemented to ensure that persons are appropriately screened for the information to which they will be allowed to access, that they receive no access outside their need to know, that appropriate procedures are in place for the establishment and closure of user accounts, and that users are aware of their responsibilities to protect the data to which they have access.

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, all or a portion of the records or information contained in LRAM may be disclosed outside DOI as a routine use pursuant to 5 U.S.C. 552a(b)(3) which are identified within the INTERIOR/LLM-32 Land & Minerals Authorization Tracking System; 56 FR 5014, February 7, 1991; Modifications published 73 FR 17376, April 1, 2008 and 86 FR 50156, September 7, 2021 and INTERIOR/DOI-86, Accounts Receivable: FBMS, 73 FR 43772, July 28, 2008; Modification published 86 FR 50156, September 7, 2021. There is a risk that authorized users will conduct unauthorized activities such as using, extracting, and sharing information with unauthorized recipients. This risk is mitigated by limiting access to the system to only those personnel, with supervisor approval, that have an official need-to-know to perform their job duties. Access to information is role-based and is only granted on a need-to-know basis and requires DOI credentials. Accounts are reviewed annually to ensure that only authorized personnel have systems logins. Additionally, any account that is inactive for more than one year is automatically suspended. All personnel accessing the system must acknowledge the rules of behavior prior to each login. The System Security and Privacy Plan describes the practice of audit trails. Audit trails maintain a record of system activity and user activity including invalid logon attempts and access to data via User ID, etc. Audit trails are also captured within the system to determine who has added, deleted, or changed the data within the system.

There is a risk that information is retained longer within the LRAM system than necessary to accomplish a legitimate purpose or in accordance with an approved records retention schedule. The data collected has intentionally been limited; only the minimal amount of data needed for processing purposes is maintained and used by the system to support the BLM mission. Records in this system are related to the management of land and realty actions and billing information, including CSRC, for all ROW and other public lands and realty authorizations and have



historical value. Due to their value, these records have a permanent records retention, and all records are transferred to NARA according to their retention disposition instructions and the BLM Records Management policy. Users also are reminded through records management policy and training that they must follow the applicable retention schedules and requirements of the Federal Records Act.

LRAM records have been scheduled as permanent, so temporary destruction processes are not applicable. There is a risk that records may not transfer to NARA per disposition instructions, and as required. This risk is mitigated by having BLM Records Officers working with Program Specialists to ensure records requirements are effectively integrated into the design, development, and deployment of Electronic Information Systems. Records Custodians are responsible for properly managing records, as designated and assigned, throughout their life cycle (creation or receipt, maintenance and use, and disposition), ensuring no unauthorized disposals. In addition, all Privacy Impact Assessments are reviewed by the BLM Records Officer or their representative to ensure the records have been properly scheduled and approved by NARA. All BLM workforce are required to complete records management training and those with increased records management responsibilities, complete supplemental role-based training when assigned responsibilities for records which goes beyond their personal working files. In addition, Permanent records are never destroyed and are always identified for transfer to NARA at a specific time after cutoff.

There is a risk that individuals may not receive adequate notice on how their PII may be used. This risk is mitigated as individuals are notified of the privacy practices through the publication of this privacy impact assessment. Notice is also provided through the Privacy Act Statements provided on bureau/office forms used in the application process and through the published INTERIOR/LLM-32 Land & Minerals Authorization Tracking System; 56 FR 5014, February 7, 1991; Modifications published 73 FR 17376, April 1, 2008 and 86 FR 50156, September 7, 2021 and INTERIOR/DOI-86, Accounts Receivable: FBMS, 73 FR 43772, July 28, 2008; Modification published 86 FR 50156, September 7, 2021 SORNs which may be viewed at <https://www.doi.gov/privacy/sorn>. These notices provide information to individuals on how their PII will be used and shared and how they may seek notification, access, or amendment of their records.

## Section 4. PIA Risk Review

### A. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes

Information in the LRAM system has been collected for the purpose of establishing a record of authorized uses of public lands and billing those users. The use of the data is both relevant and necessary for the purpose of providing Bureau employees with a centralized source of use authorizations (permits, leases, and ROWs).

No



**B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?**

Yes

No

**C. Will the new data be placed in the individual's record?**

Yes

No

**D. Can the system make determinations about individuals that would not be possible without the new data?**

Yes

No

**E. How will the new data be verified for relevance and accuracy?**

Not applicable as no new data is placed in the individual's record.

**F. Are the data or the processes being consolidated?**

Yes, data is being consolidated. *Describe the controls that are in place to protect the data from unauthorized access or use.*

No, data or processes are not being consolidated.

**G. Who will have access to data in the system or electronic collection? Indicate all that apply.**

Users

Contractors

Developers

System Administrator

Other: *Describe*

**H. How is user access to data determined? Will users have access to all data or will access be restricted?**

Users can only access LRAM if they possess an active BLM AD account and belong to a LRAM user permissions group controlled by the user representative. They first must sign into the BLM Intranet using their PIV card and either their network user ID and password, or their PIN. They



may then either access LRAM by using the BASS, SSO or LRAM URLs both of which validate the user's credentials against BLM AD. Their assigned user permission group restricts their ability to access and change data based on their assigned permission level (query, user, manager, and owner). Each user group has specific data modification privileges based on their job functions.

Each user, with their manager's approval, will be granted one of four defined hierarchical levels of data security within the application (not including ad hoc queries): query, user, manager, and owner. Each level grants its own privileges plus the privileges of all levels below it in the hierarchy.

- Query level security will allow execution of selected reports for all users.
- User level security will allow users to add/modify/delete data associated with the office level to which they have been authorized and will allow them to execute all reports.
- Managers will have privileges associated with such functions as setting defaults for their offices and will also have user authority.
- The system owner will have privileges such as adding/deleting offices and maintaining user access and will also have user and manager authority.

**I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?**

Yes

Contractors were involved with the design and development of the system and will be involved with the operations and maintenance of the system. FAR clauses that address privacy implications and responsibilities are included in the contract(s).

No

**J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?**

Yes. *Explanation*

No

**K. Will this system provide the capability to identify, locate and monitor individuals?**

Yes: The Assessment and Authorization (A&A) process requires a system security and privacy plan (SSP) outlining the implementation of the technical controls associated with identification and authentication. The LRAM SSP describes the practice of audit trails. Audit trails maintain a record of system activity and user activity including invalid logon attempts and access to data via User ID, IP Address, etc.

No



**L. What kinds of information are collected as a function of the monitoring of individuals?**

The audit logs contain the user ID, date/time of access, invalid logon attempts, user activity, and as identified in the previous response, IP address for the employee who entered or modified the database record but does not link it to any other PII information.

**M. What controls will be used to prevent unauthorized monitoring?**

All BLM employees with access to the LRAM system are required to complete training in Federal Information Systems Security Awareness, Privacy Awareness, Records Management, Section 508 Compliance, Paperwork Reduction Act, and Controlled Unclassified Information (CUI) prior to being given access to the system, and on an annual basis, thereafter. All BLM employees with the highest level of administrative access to LRAM are required to complete applicable role-based training. In addition, all BLM employees are required to acknowledge they have read, understood, and agreed to abide by the DOI Rules of Behavior. Violations of the Rules of Behavior are considered IT security incidents. According to the Department of Interior policy, all suspected actual or threatened incidents involving the destruction, physical abuse or loss of technological resources shall be reported to the appropriate authorities. BLM employees shall report observed security incidents to their supervisors or the local Information System Security Officer (ISSO). The ISSO may recommend the removal of any individual User ID and password from any BLM computer system in the event of a security incident. Other controls include access controls, least privileges, training, and monitoring user activities.

**N. How will the PII be secured?**

(1) Physical Controls. Indicate all that apply.

- Security Guards
- Key Guards
- Locked File Cabinets
- Secured Facility
- Closed Circuit Television
- Cipher Locks
- Identification Badges
- Safes
- Combination Locks
- Locked Offices
- Other. *Describe*

(2) Technical Controls. Indicate all that apply.

- Password
- Firewall
- Encryption
- User Identification
- Biometrics



- Intrusion Detection System (IDS)
- Virtual Private Network (VPN)
- Public Key Infrastructure (PKI) Certificates
- Personal Identity Verification (PIV) Card
- Other. *Describe*

(3) Administrative Controls. Indicate all that apply.

- Periodic Security Audits
- Backups Secured Off-site
- Rules of Behavior
- Role-Based Training
- Regular Monitoring of Users' Security Practices
- Methods to Ensure Only Authorized Personnel Have Access to PII
- Encryption of Backups Containing Sensitive Data
- Mandatory Security, Privacy and Records Management Training
- Other. *Describe*

**O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.**

The BLM Assistant Director for WO-300, Energy, Minerals, and Realty Management, serves as the LRAM Information System Owner and the official responsible for oversight and management of the LRAM security controls and the protection of customer agency information processed and stored by LRAM. The Information System Owner is responsible for ensuring adequate safeguards are implemented to protect individual privacy in compliance with Federal laws and policies for the data managed and stored in LRAM. The Information System Owner is responsible for protecting the privacy rights of the public and employees for the information they collect, maintain, and use in the system, and for meeting the requirements of the Privacy Act, including providing adequate notice, making decisions on Privacy Act requests for notification, access, and amendments, as well as processing complaints, in consultation with the BLM Associate Privacy Officer.

**P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?**

The BLM Assistant Director for WO-300, Energy, Minerals, and Realty Management, has responsibility for daily operational oversight and management of the system's security and privacy controls, for ensuring to the greatest possible extent that the data is properly managed and that all access to the data has been granted in a secure and auditable manner. The LRAM Information System Owner, the Information System Security Officer and any authorized users are responsible for ensuring that any loss, compromise, unauthorized access, or disclosure of PII



is reported to DOI-CIRC within 1-hour of discovery in accordance with Federal policy and established DOI procedures, and appropriate remedial activities are taken to mitigate any impact to individuals, in coordination with the BLM Associate Privacy Officer.