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: Send Word Now - BSEE Direct Messaging Service
Bureau/Office: Bureau of Safety and Environmental Enforcement
Date: 03/06/2020
Point of Contact:
Name: Rowena Dufford
Title: Associate Privacy Officer
Email: privacy@bsee.gov
Phone: (703) 787-1257
Address: 45600 Woodland Road, Sterling VA 20166

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 Department of the Interior (DOI) Bureau of Safety and Environmental Enforcement (BSEE) executes its responsibilities and mission under the statutory authority of the Outer Continental Shelf Lands Act (OCSLA), 43 U.S.C. 1331-1356a. When BSEE has critical safety information to share with offshore oil and gas workers, the Office of Public Affairs (OPA) used Send Word Now (SWN) to quickly notify them of new safety information posted to BSEE.gov. The information consisted of publicly available safety alerts and bulletins.

BSEE briefly used SWN to perform its BSEE Direct Messaging Service, which is a messaging service that provided recipients notifications on new safety information posted to BSEE.gov. It has since been replaced with another messaging system, Everbridge, for which there is a current privacy impact assessment under the program name BSEE!Safe.

BSEE SWN is no longer in use. All subscriber information has been removed from BSEE SWN.

C. What is the legal authority?

The Outer Continental Shelf Lands Act (OCSLA), 43 U.S.C. 1331-1356.

D. Why is this PIA being completed or modified?

Indicate why the PIA is being conducted. For example, the system is being significantly modified or two systems are being merged together.

☐ 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:

E. Is this information system registered in CSAM?

☑ Yes: Enter the UII Code and the System Security Plan (SSP) Name

UII Code: 010-00002039-00-06-01-07-03-00; a System Security Plan was never completed

☐ No
F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

<table>
<thead>
<tr>
<th>Subsystem Name</th>
<th>Purpose</th>
<th>Contains PII (Yes/No)</th>
<th>Describe If Yes, provide a description.</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>No</td>
<td>N/A</td>
</tr>
</tbody>
</table>

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

☐ Yes: List Privacy Act SORN Identifier(s)

☒ No

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

☐ Yes: Describe

☒ No

Section 2. Summary of System Data

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

☐ Name ☐ Religious Preference ☐ Social Security Number (SSN)
☐ Citizenship ☐ Security Clearance ☐ Personal Cell Telephone Number
☐ Gender ☐ Spouse Information ☐ Tribal or Other ID Number
☐ Birth Date ☐ Financial Information ☐ Personal Email Address
☐ Group Affiliation ☐ Medical Information ☐ Mother’s Maiden Name
☐ Marital Status ☐ Disability Information ☐ Home Telephone Number
☐ Biometrics ☐ Credit Card Number ☐ Child or Dependent Information
☐ Other Names Used ☐ Law Enforcement ☐ Employment Information
☐ Truncated SSN ☐ Education Information ☐ Military Status/Service
☐ Legal Status ☐ Emergency Contact ☐ Mailing/Home Address
☐ Place of Birth ☐ Driver’s License ☐ Race/Ethnicity
☐ Other: Specify the PII collected.

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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: Describe

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 Describe
☐ Other:

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

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

☐ Within the Bureau/Office: Describe the bureau/office and how the data will be used.

☐ 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.
☐ 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:  *Describe the method by which individuals can decline to provide information or how individuals consent to specific uses.*

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

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

☐ Privacy Act Statement:  *Describe each applicable format.*

☐ Privacy Notice:  *Describe each applicable format.*

☐ Other:  *Describe each applicable format.*

☒ None

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

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

☐ Yes:  What will be the use of these reports? Who will have access to them?

☒ No

**Section 3. Attributes of System Data**

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

BSEE SWN is no longer in use. All subscriber information has been removed from BSEE SWN.
B. How will data be checked for completeness?

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

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

The records have been moved under the BSEE!Safe Program.

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

The records have been moved under the BSEE!Safe Program.

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.

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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:

☒ No

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

☐ Yes: Explain what risks are introduced by this data aggregation and how these risks will be mitigated.

☒ No

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

☐ Yes:  *Explanation*

☒ No

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

☐ Yes:  *Explanation*

☒ No

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

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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.*

☐ Yes, processes are 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*

Authorized BSEE personnel will have access to data on a need-to-know basis.

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

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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. *Were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?*

☒ 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. *Explanation*

☒ No

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

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

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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.

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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?

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