



## 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; handwritten 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:** ePlanning  
**Bureau/Office:** BLM / OC-381  
**Date:** July 21, 2017  
**Point of Contact:** ePlanning Project Manager  
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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?

ePlanning is a web-based application which is a bureau initiative for authoring, reviewing and commenting on National Environmental Policy Act (NEPA) documents that consists of fully integrated text with intelligent and interactive maps and map layers. To accomplish this, ePlanning provides automated tools and information technology so that inter-disciplinary teams can simply create these integrated documents. Some related goals are to: Provide a common look, feel, and functionality for BLM NEPA documents through enterprise solutions, establish a new and efficient method for public participation in the NEPA process, create reusable data for processing post-analysis actions, and create a project record. ePlanning establishes a new mechanism for NEPA analyses that



allows for an openly participative, collaborative, and community-based system envisioned in the BLM Planning Manual.

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

- Federal Land Policy and Management Act, 43 U.S.C. 1701
- Information Technology (IT) Management Reform Act of 1996 (ITMRA; also known as the Clinger-Cohen Act)
- Chief Financial Officers (CFO) Act of 1990
- Government Performance and Results Act (GPRA) of 1993
- Federal Acquisition Streamlining Act (FASA) of 1994
- Paperwork Reduction Act (PRA) of 1995
- Office of Management and Budget (OMB) Circular A-130
- OMB Memoranda M-03-18 and M-03-22.
- Taylor Grazing Act, 43 U.S.C. 315, 316

**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: *Enter the UII Code and the System Security Plan (SSP) Name*  
010-04-01-07-01-0409-00, AD-200 System Security Plan
- 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	None	No	N/A

**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
- Personal Email Address
- Home Telephone Number
- Mailing/Home Address
- Other: *Specify the PII collected.*

General comments in the form of typed text regarding selected text or map elements found in a given Interactive Digital Document. There is no control over the content of the comments returned from individual members of the public; any manner of personal information could conceivably be entered here. BLM Employee name is pulled from Active Directory (AD) for the purpose of identifying the applicable BLM representative managing the project.

**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*
- Biographical information is obtained from the individuals themselves.

**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
- Other: *Describe*

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

The ePlanning “back office” module supporting comment entry and management provides a function to sort and display NEPA comments by the project name. This view of the comment data is available only in the web-based “back office” application, which is secured from public access. Final Interactive Digital Documents for BLM NEPA will likely contain representative comments from members of the public and the corresponding responses from government Planners. Task-progress information about Back Office users can be viewed by project team members. This information will be used for tracking the progress of BLM NEPAs.

**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.*  
Final Interactive Digital Documents for BLM NEPAs will likely contain representative comments from members of the public and the corresponding responses from government Planners. Task-progress information about Back Office users can be viewed by project team members. This information will be used for tracking the progress of BLM NEPAs.
- 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.*

When submitting comments via this website, you are not required to provide your name or address. You may still provide this information for contact purposes if you would like to be contacted by the BLM regarding the project on which you have submitted a comment. If you consider your name and address to be confidential, do not include it in your comment. In an effort to improve transparency, each project will make all comments available to the public.

If you identify yourself when submitting a comment, we will save any contact information you provide to a database so that we can better serve you. We use the mailing or email address when attempting to notify you of the status of the project. If you do not provide your contact information, we will not be able to contact you for questions or notifications regarding your comment.

Any information that we collect as part of the comment process may be subject to disclosure, but will be handled in accordance with the requirements of the Privacy Act and the Freedom of Information Act to ensure the greatest protection of personal privacy in the face of any required disclosure.

We will not obtain personally identifiable information about you when you visit our site unless you choose to provide such information to us. Except in rare instances where required by law, we do not share any information we receive with outside parties.

Click **I Accept these Terms and Conditions** to continue to the next section of the comment form, or click **I Do Not Accept** to return to the ePlanning home page.

- 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: *Describe each applicable format.*

- Privacy Notice: *Describe each applicable format.*

When submitting comments via this website, you are not required to provide your name or address. You may still provide this information for contact purposes if you would like to be contacted by the BLM regarding the project on which you have submitted a comment. If you consider your name and address to be confidential, do not include it in your comment. In an effort to improve transparency, each project will make all comments available to the public.

If you identify yourself when submitting a comment, we will save any contact information you provide to a database so that we can better serve you. We use the mailing or email address when attempting to



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Click **I Accept these Terms and Conditions** to continue to the next section of the comment form, or click **I Do Not Accept** to return to the ePlanning home page.

Other: *Describe each applicable format.*

None

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

The information cannot be retrieved by individual identifier and will only be retrieved by project name.

**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?**

Data is automatically managed within the ePlanning system. No manual processes are involved. Individuals who want to make comments on NEPA documents are required to enter their name, city, state and country information.

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

Individuals who want to make comments on BLM NEPAs are given an opportunity to enter their name, city, state and country information. The accuracy or completeness of this entry is not verified and not a requirement for comment submittals.



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

None. ePlanning collects information about BLM NEPAs and comments on the BLM NEPAs, not individuals.

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

BLM NEPA project records are permanent records. They will be maintained in electronic format within the ePlanning system for 20 years, after which they will be archived in accordance with BLM and NARA policies (MS 1220, Retention Schedule 4 item 19 including all sub-items).

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

Temporary records are disposed of in accordance with the applicable records schedule and DOI policy. Approved disposition methods include burning, pulping, shredding, erasing and degaussing in accordance with the applicable records schedule, DOI 384 Departmental Manual 1, and NARA guidelines. Permanent records that are no longer active or needed for agency use are transferred to the National Archives for permanent retention in accordance with NARA Guidelines.

**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.**

Access to PII data is controlled via management of access through ePlanning logins and project role assignments. Project Managers are responsible for assigning user roles on individual projects, which determines the level of access for each user on each project. The system will provide capability to monitor task progress for individual Back Office users, who can be identified by name.

There is minimal risk associated with the use of this system. The risk associated with this system comes predominantly from user error and the sharing of information within the comment section of the system where it can be seen by members of the public who are looking at this system. The comments submitted to ePlanning are required by NEPA to be a matter of public records, so if PII is submitted within those comments it would also be made public.

## **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: *Explanation*

If you identify yourself when submitting a comment, we will save any contact information you provide to a database so that we can better serve you. We use the mailing or email address when attempting to notify you of the status of the project. If you do not provide your contact information, we will not be able to contact you for questions or notifications regarding your comment.

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

**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?**

Individuals who want to make comments on BLM NEPA s are required to enter their name, city, state and country information. The content entered is not evaluated for “relevance or accuracy”; all comments must be processed, regardless of their perceived “relevance or accuracy”.

**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*

BLM authorized employee users, managers, system administrators and contractors will have access to data in this system. Distribution of final BLM NEPA decisions in electronic and printed forms will contain representative examples of public comments and will be available to all. The use of an individual's comments in a final Plan document is contingent solely on whether they have provided express permission to do so during the comment submission process.

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

ePlanning accounts do not give users access to any data; users can only access data once a project's manager team lead has assigned them a user role for a project. Project Managers are responsible for assigning user roles on individual projects, which determines the level of access for each user on each project. The system provides the capability to monitor task progress for individual Back Office users, who can be identified by name.

**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?*

Contractors were involved with the design and development of the system and will be involved with the operations and maintenance of the system. All contractors are hired through the GSA schedule or onsite support contracts, which comply with all requirements of the Privacy Act and contains Privacy contract clauses.

- 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?**

This system does not provide the capability to identify, locate and monitor individuals.

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

This system does not provide the capability to identify, locate and monitor individuals.

**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-200 Renewable Resources Planning serves as the ePlanning Information System Owner and the official responsible for oversight and management of the ePlanning security controls and the protection of customer agency information processed and stored by the ePlanning. 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 ePlanning. 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.

**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-200 Renewable Resources Planning 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 ePlanning Information System Owner and the BLM Information System Security Officer are responsible for ensuring that any loss, compromise, unauthorized access or disclosure of PII is reported to US-CERT within 1-hour of discovery in accordance with Federal policy and established procedures, and appropriate remedial activities are taken to mitigate any impact to individuals, in coordination with the DOI Privacy Officer.