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: Interior Valuation Information System (IVIS)
Bureau/Office: Office of Valuation Services (OVS)
Date: September 28, 2017
Point of Contact
Name: Teri Barnett
Title: Departmental Privacy Officer
Email: DOI_Privacy@ios.doi.gov
Phone: (202) 208-1605
Address Line: 1849 C Street NW, Room 7112, Washington, DC 20240

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 Interior Valuation Information System (IVIS) is a cloud-based client-accessible web application which provides a common form for submission of real property appraisal services requests to the Department of the Interior (DOI) Office of Valuation Services (OVS).

OVS supports the real estate appraisal functions for DOI bureaus and offices, including the Bureau of Land Management (BLM), Bureau of Reclamation (BOR), U.S. Fish and Wildlife Service (FWS), and the National Park Service (NPS). OVS also provides mineral evaluations for these OVS client
bureaus/offices, as well as for the Bureau of Indian Affairs (BIA) and the Office of the Special Trustee for American Indians (OST). OVS supports these bureaus and offices by receiving the client bureau/office appraisal request, scoping the request in order to create a statement of work, completing a minerals evaluation, hiring an appraiser to appraise the land, and reviewing the appraisal before forwarding it to the requesting client bureau/office, and providing the mineral evaluation service.

OVIS uses the IVIS application to track valuation product requests from DOI bureaus and offices, such as land evaluations and mineral requests, to obtain valuations for real property, analysis of market rents, and evaluations of mineral rights including market analysis of economic conditions and pricing for minerals. The appraisal management business functionalities provided by IVIS include property management, case management, account or contact management, and reporting and analytics by the Salesforce community.

This IVIS application is provided to DOI as a Software as a Services (SaaS) that is owned and operated by Salesforce.com. Salesforce.com is the cloud service provider that houses the system infrastructure and application. Salesforce.com is a FedRAMP authorized provider that manages the database, operating system, hardware and software, and has implemented security controls based on National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 control standards and General Services Administration requirements.

C. What is the legal authority?


D. Why is this PIA being completed or modified?

☑ 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
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)*

A SORN is under development for IVIS.

□ 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 Cell Telephone Number
☒ Tribal or Other ID Number
☒ Personal Email Address
☒ Home Telephone Number
☒ Mailing/Home Address
☒ Other: *Specify the PII collected.*

The information provided in the system relates to real or mineral property estates to be valued. In most cases, the property is government owned; however, some of the property is privately owned, and some of the private owners are individuals. The system also contains information about private property owners, which may include name, physical address, mailing address, tax map and lot numbers, and
information on public documents, such as book and page numbers for deeds, and other recorded documents. The system also contains information about businesses by sole proprietors who operate under their own names, and information concerning these sole proprietors could include name, business address, business mailing address, business telephone numbers, and business email address. The personal and contact information in the system is largely available through public sources. In the case of appraisers, only business contact information that is generally available through a wide range of public sources is collected. For individual private property owners, information obtained is publicly available through municipal tax records and public land recordings held by municipal clerks, registry of deeds, or courts.

The system also contains usernames, which is the IVIS System user identification information, and passwords, including the bureau/office users’ usernames and that of the contractors working on appraisal assignment. DOI contractors will have limited access to open cases assigned to them. Their user account will be deactivated upon completion of the assignment.

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

Information about contract appraisers is obtained from the National Registry’s Appraisal Subcommittee directory or directly from the contract appraiser when bidding on an assignment. Information about private property owners is obtained from the individuals or their designated representative by the bureau requesting the property valuation and submitted to OVS.

All information pertaining to private property owners is entered into the system by officials from DOI bureaus and offices, including BLM, BOR, FWS, and NPS, when requesting property valuations. Information is also collected from the Trust Asset and Accounting Management System database, a BIA system that tracks tribal owned lands including ownership or contact information. These lands may also be forwarded to OVS requesting appraisal services for a particular property.

In certain cases, publicly available tax records and recorded real estate documents may be obtained from certain municipalities and local agencies. The data is public information but is entered into the system by DOI employees.

Information provided by individuals, such as contact information for valuation service businesses, may be verified by system administrators or OVS employees if there appears to be a discrepancy. The information entered into the system concerning contract appraisers typically comes directly from the
The Bureau Realty Staff initiate IVIS cases and collect all types of data and information as part of the
due diligence required to complete a lands action. Property of interest is located in project areas
identified as management units and in Indian Reservations for American Indians. The public records
will indicate that the land within the Reservation is owned by a tribe or American Indians.

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: Describe

Information about private property owners is obtained from the bureau or office requesting a property
valuation. The bureaus and offices initially obtain the property owner information by searching the
public records online or through contacting county record officer. The face-to-face contact method is
used by bureaus and offices to verify property owner contact information.

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

IVIS contains two types of personal information, including information about contract appraisers and
information about private property owners. Contract appraiser information is used to ensure the correct
contract appraiser is selected during the valuation routing process using criteria such as licensing,
location, and areas of valuation expertise. Private property owner information is necessary in order to
complete various transactions with those owners, such as the purchase of land, mineral, or easement
rights. In addition, it is a requirement of the Uniform Appraisal Standards for Federal Land Acquisitions
that property owners or a designated representative is given the opportunity to accompany the appraiser
on the property inspection. The information is collected to comply with these requirements.

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.

Information such as property owner contact information in IVIS is shared within OVS to schedule
property inspections as required by the Uniform Act. OVS maintains the confidentiality of all
information related to a valuation assignment using roles, profiles, and permission sets. Records may be
accessed only by limited users including OVS staff, Bureau Realty staff and contract appraisers working
on an active open case.
☒ Other Bureaus/Offices: Describe the bureau/office and how the data will be used.

OVS will only share valuation information with clients after OVS reviewed and approved it for agency use. OVS’ client bureaus and offices will have access to their own records only. These client bureaus and offices include: BLM, BOR, BIA, OST, NPS, and FWS.

Only employees of DOI bureaus/offices and agencies who use IVIS in performing their job duties are given user-level access. Bureau/office officials who use IVIS have access only to valuation cases submitted by their bureau/office. OVS employees are assigned to teams that serve specific bureaus/offices. Each team can only view the information pertaining to cases for the bureaus/offices served by them. Users must be registered prior to viewing data in the system, and are authenticated in the system by username and password.

☐ 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 will have limited access to the system and will only be allowed to share documents for the purpose of completing specific cases assigned to them. They will not have access to the system or records once an assigned case is closed.

☐ 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.

For private landowners, entering the valuation process and engaging in a property transaction is a voluntary process. Property owners have the right to decline to participate in the process and not to provide personal information. However, for landowners who enter the valuation process, the information is required by the bureau or office requesting the valuation, as the Uniform Appraisal Standards for Federal Land Acquisitions require that property owners or a designated representative be given the opportunity to accompany the appraiser on the property inspection.

Contract appraisers that voluntarily perform valuations services under contract must provide information requested by DOI. At a minimum, contract appraisers who wish to perform valuations must provide business contact information.
☐ 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.

Bureaus and offices have the option of using forms to collect information, such as Standard Form 299, Applications for Transportation and Utility Systems and Facilities on Federal Lands, to manually input the information into the IVIS system. There are some bureaus and offices that use a bureau/office specific form to collect information, and these bureaus and offices are responsible for ensuring their forms contain required Privacy Act Statements or a privacy notice when PII is collected.

☒ Privacy Notice: Describe each applicable format.

Notice is provided through publication of this privacy impact assessment.

☐ 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.).

Information about appraisers and valuation professionals in IVIS may be retrieved by keyword search of the contact directory or by browsing the full contact directory. These search functions are only available to authorized OVS employees. Information concerning specific properties can be obtained using keyword searches which will also link property owner contact information. Information may be retrieved by name and address of the appraisers and valuation professionals.

A query can be run to identify records that belong to an American Indian land owner. This allows record sorting for file management purposes as all records associated with American Indians have a different retention schedule than other records.

I. Will reports be produced on individuals?

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

The reports will include information such as work in progress, completed assignments, and various process metrics attributed to assignments. The purpose or intended use of the report is to effectively manage the OVS program of work and identify opportunities for process improvement. Only authorized OVS IVIS users will have the ability to query and run reports.
Section 3. Attributes of System Data

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

The data collected through manual intake are required to be verified by the person providing the information. OVS employees can update contract appraiser profile information as needed. Other updates to the data is made by the Site Administrator and the System Administrator.

B. How will data be checked for completeness?

When a valuation request is entered into IVIS, there are automated validation mechanisms to ensure that required information fields are completed. Certain data fields are subject to additional validation to ensure that the proper type of data is entered.

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

The assignment cycle times are typically 150 days or less, therefore, information provided at the beginning of each case is current. The record may be updated by the system user or administrator during the completion of the assignment as necessary.

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

Retention periods vary as records are maintained in accordance with the records schedule approved by the National Archives and Records Administration (NARA) for each specific type of record. Pursuant to Office of the Secretary (OS) records schedule 7569 (IVIS, N1-048-10-01, Item 10.4, Appraisal Request & Review Tracking System (ARRTS)), the disposition for appraisal request and review files in the system is temporary and cut-off at the final updating of the record. Records are archived to inactive storage media 25 years after cut-off and destroyed 75 years after cut-off. Website files are retained in accordance with OS records schedule 1217. Under schedule 1217, cut-off occurs when the data is superseded and the data is destroyed when no longer needed for agency business. Records associated with Indian Trust assets have a separate retention schedule for Trust records.

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

IVIS is integrated with DOI’s enterprise record management system which provides streamlined life cycle records management. Records are disposed of in accordance with NARA guidelines and DOI records management policies. Disposition of paper records includes shredding, burning and tearing, and electronic records are degaussed in accordance with 384 DM 1.
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 are privacy risks for collecting personal information for the purpose of conducting land valuation on private landowners. Even though some of the personal information of the landowners are collected in IVIS through retrieving available records from other public sources, there are privacy risks related to the consent and notice process since DOI is not involved in the business course of other public sources initially and these publically available data is being used, processed, and maintained in combination with other business and personal information in the system. DOI is obligated to safeguard the data and protect the information in its system, and protect the privacy right of individuals. Access to information in IVIS is restricted to authorized users based on least privilege principle. To mitigate privacy risks, the bureaus and offices establish processes to ensure that a Privacy Act Statement or Privacy Notice are embedded in the official forms used to collect PII. The records of American Indian landowners are handled with different records schedules with corresponding privacy and security controls in place.

There are privacy risks related to the use and disclosure of information. The data in IVIS is only used for land valuation. OVS will only initiate the valuation process based on the requests submitted by interested parties. The data will only be shared with the contractors within the specific bureau or office for official purposes. Once the case is completed, the contractor will no longer have access to the system.

IVIS is a FISMA moderate application and is provided to DOI as a SaaS hosted by Salesforce.com, a cloud service provider that is FedRAMP authorized. The IVIS system currently resides in a Federal single tenant cloud. The redesigned IVIS application provides contractor access through assigned username and password controls in order to share documents in support of open cases. Vendors are obligated to comply with all Departmental security controls related to the access and sharing of information, and privacy controls to ensure PII is safeguarded. Further, IVIS maintains actionable audit logs for all transactions which are accessible by authorized IVIS administrators and reviewed and tested on a monthly and annual basis. All DOI personnel are required to complete initial and annual privacy, security and records management training, and sign DOI Rules of Behavior.

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

The mission of the organization is to provide valuation services to DOI for properties held by and those which the Department is working to acquire. The system provides workflow, analytical tools and data storage that allows for the accomplishment of these tasks as per the mission.
B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?

☐ No

☐ 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?

IVIS does not derive new data or create previously unavailable data about an individual through data aggregation.

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

Access is restricted to authorized users based on least privilege principle to perform services. Property owners will not have access to the system. Contractors will have limited access to open cases assigned to them for the sole purpose of sharing document files. Access is restricted by assigning a username and password and is removed upon completion of the assignment. System users will have access to cases assigned to them and OVS users will be restricted to view-only-access to all records within the system. Users that have been inactive for 90 days will have their user account disabled.

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?

The appropriate privacy clauses and provisions were included in the contract with Salesforce.

☐ 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

The IVIS audit log collects information on the date and time of the event that occurred, where the event occurred, the source of the event, the outcome (success or failure) of the event, and the identity of any user or subject associated with the event.

☐ No

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

IVIS audit log collects information on when (date and time) the event occurred, where the event occurred, the source of the event, the outcome (success or failure) of the event, and the identity of any user/subject associated with the event. Salesforce provides auditing for IVIS systems including but not limited to successful login, unsuccessful login, account management, policy change, privileged functions and system events.
M. What controls will be used to prevent unauthorized monitoring?

IVIS security is controlled by groups of users. Groups of users are designated to view data within the IVIS platform, and are reviewed and managed by authorized OVS staff. These groups are managed by the systems administrator and periodically reviewed. Audit logs further ensure protection of data through consistent audit log monitoring. The audit logs are monitored by authorized officials on a need-to-know basis.

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

The Salesforce FedRAMP documentation describes the applicable physical controls.

(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

The Salesforce FedRAMP documentation describes the applicable technical controls. PIV card and PIN numbers are managed by the DOI single sign-on and used to authenticate users. Users that have been inactive for 90 days will have their user account disabled.
(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

The Salesforce FedRAMP documentation describes the applicable administrative controls.

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 Chief, Valuation Systems Division, Office of Valuation Services is the IVIS Information System Owner and the official responsible for oversight and management of the IVIS security controls and the protection of customer agency information processed and stored by the IVIS system. The Information System Owner, Information System Security Officer, and the IVIS Privacy Act System Manager are responsible for ensuring adequate safeguards are implemented to protect individual privacy and providing adequate notice, making decisions on Privacy Act requests for notification, access, and amendment, as well as processing complaints, in consultation with DOI Privacy Officials. These officials and authorized IVIS personnel are responsible for protecting individual privacy for the information collected, maintained, and used in the system, and for meeting the requirements of the Privacy Act and other Federal laws and policies for the data managed, used, and stored in IVIS.

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 IVIS Information System Owner is responsible for daily operational oversight and management of the system’s security and privacy controls, and ensuring to the greatest possible extent that agency data is properly managed and that all access to agency data has been granted in a secure and auditable manner. The Information System Owner, Information System Security Officer, and authorized users are responsible for ensuring that any loss, compromise, unauthorized access or disclosure of PII is reported to DOI-CIRC, DOI’s incident reporting portal, and appropriate DOI officials in accordance with Federal policy and established DOI procedures.