



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: Ohmsett IT Program

Bureau/Office: Bureau of Safety and Environmental Enforcement

Date: April 12, 2019

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?

Ohmsett is a Government Owned Contractor Operated (GOCO) oil spill response test facility located on a naval base, Naval Weapons Station Earle. Ohmsett is used by government agencies, private entities and academia, both domestically and from around the world, to test, train, and improve oil spill response. Many of today's commercially available oil spill response products have been tested at Ohmsett and a considerable body of knowledge, including performance data, has been obtained there. This data is used by manufacturers for product development and validation, and by response planners in reviewing and approving any oil handling or oil producing facility response and contingency plans.

Title VII of the Oil Pollution Act of 1990 mandates the long-term use of Ohmsett. The Government Performance and Results Act (GPRA) and the GPRA Modernization Act (GPRAMA), require federal agencies to develop performance goals and report on whether or not they're meeting those goals. The Ohmsett utilization measure is part of BSEE's GPRAMA reporting. The contractor that manages and operates the facility is required to actively market the facility to maximize its use.

The contractor schedules email campaigns to promote testing, research and training opportunities available to the oil spill response community and other interested parties. It publishes and distributes the biannual Ohmsett Gazette to inform subscribers about testing, research, and training activities at the facility; the Gazette is distributed both electronically and in hard copy. Subscribers and customers opt-in to receive publications and information about Ohmsett.

The contractor will use Swiftpage ACT!, a commercial off the shelf (COTS) Customer Relationship Management (CRM) and Marketing Automation software solution to manage interactions with current and potential Ohmsett customers and subscribers. Marketing Automation subscription service provides the ability to send email campaigns and electronic newsletters. Access to the information is limited to a number of contractor personnel; while BSEE owns this information it does not have direct access but may, if needed, for official use. The contractor has the ability to create reports such as project status reports, schedule appointments, add notes and manage sales opportunities to maximize Ohmsett's usage.

Visitors to Ohmsett must complete SECNAV 5512/1, Department of the Navy Local Population ID Card/Base Access Pass Registration, herein "SECNAV 5512/1," a U.S. Navy (USN) facility access request form that is submitted to the on-site BSEE Ohmsett Liaison. The form is faxed to USN who conducts background checks and determines whether to grant the individual physical access to the naval base.

This PIA covers the entire Ohmsett Program including the processing of customer relationship management activities; use of LinkedIn to post testing, training and research opportunities and activities at Ohmsett; and, submission of SECNAV 5512/1 to USN where the facility is located.



C. What is the legal authority?

Title VII of the Oil Pollution Act of 1990, The Government Performance and Results Act (GPRA), and the GPRA Modernization Act (GPRAMA).

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*

Ohmsett is Government Owned Contractor Operated Facility. The new contractor is bringing the program into DOI compliance.

E. Is this information system registered in CSAM?

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

UII Code: The Ohmsett IT System does not yet have an UII code as it is not yet in the Capital Planning and Investment Control. Entry is pending and CSAM will be updated once assigned.

System Security Plan Name: Ohmsett IT 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)*

DOI-08, DOI Social Networks, 76 FR 44033 (July 22, 2011)
DOI-46, HSPD-12: Physical Security Files, 72 FR 11043 (March 12, 2007)

No

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

Yes: *Describe*

SECNAV 5512/1 OMB Control Number 0706-0061
The collection for CRM does not require an OMB Control Number.

No

Section 2. Summary of System Data

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

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Name | <input checked="" type="checkbox"/> Social Security Number (SSN) | <input checked="" type="checkbox"/> Personal Cell Telephone Number |
| <input checked="" type="checkbox"/> Citizenship | <input checked="" type="checkbox"/> Gender | <input checked="" type="checkbox"/> Birth Date |
| <input checked="" type="checkbox"/> Personal Email Address | <input checked="" type="checkbox"/> Employment Information | <input checked="" type="checkbox"/> Mailing/Home Address |
| <input checked="" type="checkbox"/> Place of Birth | <input checked="" type="checkbox"/> Driver's License | <input checked="" type="checkbox"/> Race/Ethnicity |
| <input checked="" type="checkbox"/> Other: <i>Specify the PII collected.</i> | | |

The information collected by the Contractor for marketing and outreach purposes includes: Business contact information: Name, title, mailing address, company name, phone number, email address, company website address, and country. Email open rates, etc. by individual subscriber. Universal Opt-out preferences. Reports obtained: Email open and click rates, Emails submitted, Emails sent, Clicks by link, Bounces, Opt-out.

Ohmsett is located on a secured naval facility. Information is collected on USN-owned form SECNAV 5512/1 to control physical access to the secured naval facility. Visitors voluntarily complete this form which is submitted to the on-site BSEE Ohmsett Liaison. The form is faxed to USN which conducts background checks and determines whether to grant the individual access to the naval base; the form is not maintained electronically by BSEE. SECNAV 5512/1 collects the following PII: Name, SSN, DOB/POB, Country of birth, gender, race, citizenship, driver's license, passport number, height, weight, hair and eye color, employer name and address, and any felony convictions. USN personnel inform the BSEE Ohmsett Liaison within the Oil Spill Prevention Division (OSPD) of visitors who are granted or



denied access; USN provides no additional information, however individuals who are denied access are provided a USN contact to appeal the decision.

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*

Visitors to Ohmsett include individuals from government agencies, private entities and academia, both domestically and from around the world. Each individual completes their own opt-in for marketing campaigns and outreach efforts. Each individual visiting Ohmsett completes their own SECNAV 5512/1.

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*

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

The contractor that manages and operates the facility is required to actively market Ohmsett to maximize its use. The information is used to fulfill requests for information about the testing, research and training services offered at Ohmsett this includes sending the biannual Ohmsett Gazette and email campaigns to subscribers.

Visitor information is used for background checks to determine if individuals should be granted physical access to the secured USN facility where Ohmsett is located.



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.*

While BSEE owns the CRM data, it does not have direct access to the information. However, the data may be requested by BSEE OSPD on a need to know basis.

Information related to the SECNAV 5512/1 form is only shared within the OSPD on a need to know basis under exigent circumstances or with law enforcement when investigating an incident at the facility. BSEE receives a list from academia to validate receipt of completed SECNAV 5512/1 from its students requesting to attend training at Ohmsett.

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.*

Data is shared with the USN for background checks prior to granting/denying physical access to the secure naval base where Ohmsett is located. Information is not shared with other external Federal agencies except in cases where sharing the information is required by law or authorized under the Privacy Act and published routine uses in the DOI-08, Social Networks SORN and DOI-46, HSPD-12: Physical Security Files SORN, which may be viewed at <https://www.doi.gov/privacy/sorn>.

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.*

The contractor uses the information for marketing purposes to include sending information related to requests for newsletters, training courses and general information about Ohmsett. They also process requests to modify or cancel subscription preferences. The contractor shares contact information with its engineers at Ohmsett to follow-up with customers who request testing and research information.

The hard copy newsletter is sent to an external printing/mailhouse vendor. The purchase order contains a link to the GOCO's Terms and Conditions, which includes links to applicable federal acquisition requirements. By accepting the order, the vendor agrees to the Terms and Conditions, which includes confidentiality, disclosure of information, and records retention. Ohmsett provides a mailing list in an Excel spreadsheet via email to the printer. The mailing house validates the list against the U.S. Postal Service National Change of Address database for accuracy. The list contains name, company, and address. The printer retains the mailing list for fourteen (14) months.

As part of its marketing efforts, the GOCO maintains an Ohmsett page on LinkedIn to post current activities at Ohmsett, but no information about individuals is collected.

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.*

Individuals voluntarily opt-in to receive information and may opt-out at any time. Individuals can specify what types of information to receive about Ohmsett and may make changes by sending a request via email to the GOCO Marketing Director.

Electronic newsletters and emails include links to unsubscribe which are honored immediately. Directions on how-to opt-out are included on the paper form individuals complete during industry conferences. The form also includes a statement that the individual's email addresses and personal information will be used by Ohmsett to communicate with them in the manner in which they gave consent and that Ohmsett will not sell or otherwise share their information with a third party.

SECNAV 5512/1 forms are completed voluntarily by individuals who wish to visit Ohmsett. Incomplete forms may result in denial of access to the secure naval base.

- 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.*

A Privacy Act statement is provided on the Ohmsett subscription page.

BSEE is pleased to offer a free e-mail subscription service to allow subscribers to receive notifications by e-mail about testing, training and research opportunities at Ohmsett as authorized under Title VII of the Oil Pollution Act of 1990, The Government Performance and Results Act (GPRA), and the GPRA Modernization Act. You will be asked to provide your e-mail address and the subscriptions you would like to receive, and may unsubscribe at any time. This service is provided by the Ohmsett contractor on behalf of BSEE to deliver the information you have requested and update your subscription preferences. More information about routine uses may be found in DOI-08, DOI Social Networks, at 76 FR 44033 (July 22, 2011), which may be viewed at <https://www.doi.gov/privacy/sorn>. Providing this information is voluntary; however, it is necessary in order to participate in this e-mail subscription service. BSEE will not share your personal information with third parties for promotional purposes. Please review the BSEE Privacy Policy for more information.



The SECNAV 5512/1 form contains a Privacy Act statement which discloses the purpose, authority, routine uses under the Navy's cited SORN that covers this collection.

Privacy Notice: *Describe each applicable format.*

The Ohmsett Contact Us Page has a link to the BSEE Privacy Policy. Privacy notice is also provided through the publication of this privacy impact assessment; the publication of DOI-08, DOI Social Networks SORN, DOI-46, HSPD-12: Physical Security Files SORN. Individuals may view the privacy policy posted on the footer of the Ohmsett website hosted by BSEE.gov.

A privacy notice is provided to individuals who attend industry conferences and sign up to receive information from Ohmsett.

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.).

Data is retrieved by Name, Company Name, email address, interest, and potential leads for marketing follow-up, e.g., Ohmsett engineers are in discussions with potential clients.

Data on the SECNAV 5512/1 form is retrieved by 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?

Individuals input their own data and check it for accuracy when submitting SECNAV 5512/1 form requests to access the naval facility and subscribing to information from Ohmsett; this information is deemed to be accurate. Individuals who sign up or provide their business cards at industry events will have their data entered by the contractor who checks for accuracy during input; a subscription confirmation email is sent with instructions on how to change their preference and/or unsubscribe. Electronic transmission of newsletters that are undeliverable will update the preference for individual subscribers as an opt-out. Mailing addresses for hardcopy newsletters are verified by the printer against



the National Change of Address database from the U.S. Postal Service. When visitors input their data on the SECNAV 5512/1 form it is considered to be accurate.

B. How will data be checked for completeness?

Individuals input their information when subscribing to the Ohmsett Gazette and emails. When an email is undeliverable the second time, the subscriber's email address is purged and the record is archived and retained in accordance with the records retention schedule. When a hardcopy newsletter is returned the first time, the subscriber is deleted; if the Postal Service returns the newsletter and provides a new address, the contact information is updated. When visitors input their data on the SECNAV 5512/1 form the BSEE Ohmsett Liaison reviews the form for completeness prior to faxing it to USN personnel.

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

Addresses are purged of undeliverable emails or hardcopy newsletters that are returned. When inputting new information into the CRM, the contractor will first check if the individual is already in the CRM. If the individual is already in the program, the contractor will check/update the information. If not, the contractor will input the individual based on information provided. The CRM program has a scan for duplicate feature that is used to clean-up the CRM to ensure individuals are not listed multiple times.

SECNAV 5512/1 forms are considered to be current at the time of completion.

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

CRM records are retained in accordance with DAA-0048-2013-0001-0001 short term administrative - routine administrative, temporary 3 years.

The SECNAV 5512/1 form submitted by visitors is maintained by BSEE OSPD in accordance with records retention schedule DAA-0048-2013-0001-0001, cut off at the end of the FY in which the record was created. Destroy 3 years after cut-off.

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

Approved disposition methods include shredding or pulping for paper records, and degaussing or erasing for electronic records, in accordance with NARA Guidelines and 384 Departmental Manual 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.

The contractor is mandated to maximize the usage rate of Ohmsett. It collects and maintains PII to fulfill requests for information about the facility regarding testing, research and training. While individuals may provide personal and/or business contact information there is a relatively low risk of harm to individuals throughout the information lifecycle.

Ohmsett IT Program is undergoing a formal Assessment and Authorization for issuance of an authority to operate in accordance with FISMA and OMB A-130 and 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, continual auditing will occur on the system to identify and respond to potential impacts to PII information stored within the Ohmsett IT Program.

During collection there is a risk that the information could be entered inaccurately resulting in an unintended party receiving the email or physical mailing. However, individuals input their own data and check it for accuracy when subscribing to information from Ohmsett. Individuals who provide their business cards at industry events will have their data entered by the contractor who checks for accuracy during input.

The use, disclosure and processing of the information may pose risks such as individuals getting information for which they did not opt-in to receive or the printer using the mailing addresses for other than its intended purpose. Individuals may opt-out from receiving specific information or any information from Ohmsett; the contractor will process their request immediately and archive their information prior to disposal in accordance with the records retention schedule. Electronic and physical transmissions of newsletters and mail that are undeliverable are noted by the contractor’s Marketing Director who checks the information against the database to either update or archive the information, as appropriate. The contractor has an agreement with the printer to only use the mailing list for its intended purpose. The printer/ mailing house vendor validates mailing addresses for hardcopy newsletters against the National Change of Address database from the U.S. Postal Service to ensure accuracy and delivery to the most current address. Access to the information is limited to contractor personnel and is not shared with BSEE who owns the data. The information is maintained on a dedicated Ohmsett computer, which is password protected.

The retention and destruction of information may pose risks that records are not maintained and destroyed in accordance with its records retention schedule. The program office and Records Office work with the contractor to ensure they are following the appropriate guidance for retain handling the records lifecycle.

The on-site BSEE Ohmsett Liaison obtains completed SECNAV 5512/1 facility access request forms from individuals wishing to visit Ohmsett. The potential privacy risks identified include inadvertent



disclosure, unauthorized access, records retention and destruction. The principle of least privilege is observed during all phases of the information lifecycle. Any unauthorized disclosure may reveal sensitive PII about Ohmsett visitors. Due to the sensitive PII collection on SECNAV 5512/2, only the on-site BSEE Ohmsett Liaison handles these requests. The USN provides the form that must be completed to conduct background checks. Visitors submit accurate and complete data on the form. The BSEE Ohmsett Liaison faxes it to USN personnel who handle the background checks. The BSEE Ohmsett Liaison reduces the risk of inadvertent disclosure by ensuring that the fax number is entered correctly prior to transmission to the secure naval location which handles these requests. The BSEE Ohmsett Liaison is notified of individuals who are cleared to access to the naval base and Ohmsett, no other data is provided by the Navy; individuals who are denied access are provided USN contact information to appeal the decision. The records are kept in a locked cabinet and destroyed in accordance with its retention schedule.

BSEE employees and contract personnel are required to complete annual Information Management and Technology (IMT) Awareness Training, which includes privacy and security training and affirming the DOI Rules of Behavior. Those with access to PII are required to also complete mandatory role-based privacy training annually.

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*

Ohmsett is a GOCO oil spill response test facility. The contractor actively markets the facility, as mandated, to maximize its use. The use of the data allows the contractor to send information to subscribers. Visitor data is used to grant or deny physical access onto the secure naval base where Ohmsett is located.

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?

No new data will be created about individuals.

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*

The GOCO Marketing Director for customer relationship management. BSEE's Ohmsett Liaison coordinates visitor access requests with USN who processes the SECNAV 5512/1 form.

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

The CRM is not an open system, only the GOCO Marketing Director has access to the system. The Marketing Director provides information on a need to know basis, (e.g., contact information is provided to Ohmsett engineers to follow-up with customers who have requested testing and research information).



Access to SECNAV 5512/1 forms is limited to the on-site BSEE Ohmsett Liaison who forwards the information to USN personnel to conduct background checks prior to granting or denying access to the secure naval facility.

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?*

Yes, the program is handled by contractor staff and Privacy Act clauses were inserted into their contract. The contractors working under the GOCO for Ohmsett shall go through Public Trust Background Investigation (MBI) background checks and shall obtain credentials to access the BSEE Network.

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?

Subscribers and visitors are not monitored by BSEE OSPD or the GOCO.

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

Subscribers and visitors are not monitored by BSEE OSPD or the GOCO.

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 Ohmsett Manager within the Oil Spill Preparedness Division serves as the Ohmsett Information System Owner and the official responsible for oversight and management of the program's security controls and the protection of agency information processed and stored by Ohmsett. The Information



System Owner, Information System Security Officer, and authorized bureau/office system managers are responsible for ensuring adequate safeguards are implemented to protect individual privacy in compliance with Federal laws and policies for the data managed and stored by the Ohmsett Program, and addressing Privacy Act requests for notification, access, amendment, and complaints in consultation with DOI Privacy Officials.

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 Ohmsett Information System Owner and Information System Security Officer are responsible for oversight and management of the Ohmsett security and privacy controls. Authorized users are responsible for immediately reporting any suspected loss, compromise, unauthorized access or disclosure of data from the system in accordance with the rules of behavior and DOI policy. The BSEE Incident Response Manager coordinates the investigation of reported violations from users. The Incident Response Manager is also responsible for ensuring that any loss, compromise, unauthorized access, or disclosure of PII is reported to the BSEE Computer Security Incident Response Team within one hour of discovery in accordance with Federal policy and procedures.