

**U.S. International Boundary & Water Commission (USIBWC)  
Information Management Division (IMD)**



**Privacy Impact Assessment (PIA)**

**For the**

**Geographic Information Systems (GIS) Office**

**Date: January 13, 2017**

**CONTACT INFORMATION AND BACKGROUND**

<b>Date Submitted to IMD:</b> January 13, 2017		<b>PIA Status</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Updated	<b>Agency:</b> U.S. International Boundary & Water Commission (USIBWC)
<b>System/Project Name:</b> General Support System / Geographic Information Systems		<b>System/Project Acronym:</b> GSS / GIS	
<b>Sponsoring USIBWC Division or Office:</b> IMD			
<b>Person Completing this PIA Form</b>  Name: Hector A. Villalobos Title: IT Specialist / Information Systems Security Officer Division: IMD Telephone: 915-832-4708		<b>Information Security Manager for this System/Project</b>  Name: Zenon Mora Title: Supervisory, IT Specialist / ISSM Division: IMD Telephone: 915-832-4755	
<b>System Owner for this System/Project</b>  Name: Maritza Dominguez Title: IT Specialist / Network Administrator Division: IMD Telephone: 915-832-4130		<b>Program Manager for this System/Project</b>  Name: Ruy Martinez Title: GIS Manager Division: GIS Office Telephone: 915-832-4160	
<b>Privacy Office or Designee</b>  Name: Matthew Myers Title: Chief Legal Counsel/ Senior Agency Official for Privacy Division: Legal Affairs Office Telephone: 915-832-4728		<b>Reviewing Official</b>  Name: Diana Forti Title: Chief Information Officer (CIO) Division: Administrative Department Telephone: 915-832-4123	
<b>Additional Points of Contact (POCs) / Subject Matter Experts for this System/Project (if applicable)</b>			
POC's Name: Title: Division: Telephone Number:		POC's Name: Title: Division: Telephone Number:	
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## Section 1.0: Introduction

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In accordance with federal regulations and mandates<sup>1</sup>, the USIBWC conducts Privacy Impact Assessments (PIAs) on systems, business processes, projects and rulemakings that involve an *electronic* collection, creation, maintenance or distribution of personally identifiable information (PII).<sup>2</sup> The objective of a Privacy Impact Assessment is to identify privacy risks and integrate privacy protections throughout the development life cycle of an information system or electronic collection of PII. A completed PIA also serves as a vehicle for building transparency and public trust in government operations by providing public notice to individuals regarding the collection, use and protection of their personal data.

To fulfill the commitment of the USIBWC to protect personal data, the following requirements must be met:

- Use of the information must be controlled.
- Information may be used only for necessary and lawful purposes.
- Information collected for a particular purpose must not be used for another purpose without the data subject's consent unless such other uses are specifically authorized or mandated by law.
- Information collected must be sufficiently accurate, relevant, timely, and complete to ensure the individual's privacy rights.

Given the vast amounts of stored information and the expanded capabilities of information systems to process the information, it is foreseeable that there will be increased requests, from both inside and outside the USIBWC, to share sensitive personal information.

Upon completion of this questionnaire and prior to acquiring signatures, please email the form to the ISSM /ISSO: [z.mora@ibwc.gov](mailto:z.mora@ibwc.gov) & [hector.villalobos@ibwc.gov](mailto:hector.villalobos@ibwc.gov) who will review your document, contact you with any questions, and notify you when the PIA is ready to be routed for signatures.

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## Section 2.0: System/Project Description

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**2.1 In this section of the Privacy Impact Assessment (PIA), describe the system/project and the method used to collect, process, and store information. Additionally, include information about the business functions the system/project supports.**

The purpose of the Proponent Application Submittal portal is to provide requirements for securing a license, lease, or permit within designated right-of-way under the jurisdiction of the United States Section of the International Boundary and Water Commission (USIBWC).

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## Section 3.0: Data in the System/Project

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*The following questions address the type of data being collected and from whom (nature and source), why the data is being collected (purpose), the intended use of the data, and what opportunities individuals have to decline to provide information or to consent to particular uses of their information.*

**3.1 What personally identifiable information (PII) (e.g., name, social security number, date of birth, address, driver's license, passport, financial account, etc.) will be collected, used or maintained in the system? Explain.**

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<sup>1</sup> [Section 208 of the E-Government Act of 2002](#) requires federal government agencies to conduct a Privacy Impact Assessment (PIA) for all new or substantially changed technology that collects, maintains, or disseminates personally identifiable information (PII). Office of Management and Budget (OMB) Memorandum [M-03-22](#) provides specific guidance on how Section 208 should be implemented within government agencies. The [Privacy Act of 1974](#) imposes various requirements on federal agencies whenever they collect, create, maintain, and distribute records that can be retrieved by the name of an individual or other personal identifier, regardless of whether the records are in hardcopy or electronic format. Additionally, [Section 522](#) of the 2005 Consolidated Appropriations Act requires certain Federal agencies to ensure that the use of technology sustains, and does not erode, privacy protections, and extends the PIA requirement to the rulemaking process.

<sup>2</sup> For additional guidance about USIBWC rulemaking PIAs, contact the IMD ISSM / ISSO Staff at ([z.mora@ibwc.gov](mailto:z.mora@ibwc.gov) & [hector.villalobos@ibwc.gov](mailto:hector.villalobos@ibwc.gov)).

The Proponent Application Submittal Portal collects names, addresses, and billing addresses from all applicants looking to conduct an activity on USIBWC right-of-way. The portal also collects contact information such as telephone and email. Depending on the type of application, proponents may be required to submit documents that may contain PII of a third party such as a letter of permission from a land owner. The portal does NOT collect social security numbers, dates of birth, nor any financial information beyond a billing address.

**3.2 What is the purpose and intended use of the information you described above in Question 3.1? (e.g., For administrative matters, For criminal law enforcement activities, To conduct analysis concerning subjects of investigative For litigation or other interest, etc.)**

The collected information is used in internal agency review of applications to conduct activities on USIBWC right-of-way. Activities range from permanent licensing of structures or works to temporary permits for a one-time event. All USIBWC staff involved with the review has access to the collected information through the System.

**3.3 Who/what are the sources of the information in the system? How are they derived? (e.g., In person, telephone, email, hard copy, online, etc.)**

Information is typically entered by the proponent via a web-interface, then it is stored within the database. The interface allows data to be entered via text-box or uploaded files. In some cases, the information may be entered by USIBWC staff in the event that the proponent does not have internet access or is not willing to use the web interface.

**3.4 What Federal, state, and/or local agencies are providing data for use in the system? What is the purpose for providing data and how is it used? Explain.**

USIBWC does not solicit information directly from other Federal agencies for the purposes of the Proponent Application Submittal Portal, unless that agency is applying for a license, lease, or permit to conduct an activity on USIBWC right-of-way.

**3.5 What other third-party sources will be providing data to the system? Explain the data that will be provided, the purpose for it, and how will it be used.**

Only proponents and USIBWC staff will provide data directly into the system. However, proponents or USIBWC may provide third party documents when required. Examples include, but are not limited to, providing appropriate documentation to ensure compliance with the National Environmental Policy Act (NEPA), providing a copy of a Presidential Permit, or showing land-owner permission when activities will be conducted on land owned by someone other than USIBWC.

**3.6 Do individuals have the opportunity to decline to provide personal information and/or consent only to a particular use of their data (e.g., allowing basic use of their personal information, but not sharing with other government agencies)?**

Yes Explain the issues and circumstances of being able to opt out (either for specific data elements or specific uses of the data):

No Explain: The requested information is required for the agency to process the application.

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## **Section 4.0: Data Access and Sharing**

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*The following questions address who has access to the data, with whom the data will be shared, and the procedures and criteria for determining what data can be shared with other parties and systems.*

**4.1 Who will have access to the data in the system (internal and external parties)? Explain their purpose for having access to this information.**

Outside of USIBWC, data can only be accessed from the account used to submit the data. Whether the applicant is a singular person or shared agency account is determined by the submitter. This outside access is required to submit application

information/documents, receive comments from USIBWC regarding their application's review status, and to amend an application as necessary.

**4.2 How is access to the data determined and by whom? Explain the criteria, procedures, controls, and responsibilities for granting access.**

A public user creates their own account for submittal of an application to USIBWC, however they can only access their own information. Internal USIBWC accounts, which are used for review purposes, are created by system administrators as necessary. Access to the internal review portal is only possible from within the USIBWC network.

**4.3 Do other systems (internal or external) receive data or have access to the data in the system? If yes, explain.**

No

Yes Explain.

**4.4 If other agencies or entities use data in the system, explain the purpose for sharing the data and what other policies, procedures, controls, and/or sharing agreements are in place for protecting the shared data.**

Not applicable. Other agencies do not use the system.

**4.5 Who is responsible for assuring proper use of data in the system and, if applicable, for determining what data can be shared with other parties and systems? Have policies and procedures been established for this responsibility and accountability? Explain.**

The portal administrator and Boundary Realty Office reviews the data in the system. Data is not shared with other parties or systems.

**4.6 What involvement will a contractor have with the design and maintenance of the system? Has a Contractor Confidentiality Agreement or a Non-Disclosure Agreement been developed for contractors who work on the system?**

Although the system was originally designed by a contractor, it is currently maintained by IBWC GIS.

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## **Section 5.0: Data Integrity and Security**

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*The following questions address how data security and integrity will be ensured for the system/project.*

**5.1 How is data in the system verified for accuracy, timeliness, and completeness?**

All data submitted into the Proponent Application Submittal Portal are manually reviewed by multiple divisions within USIBWC.

**5.2 What administrative and technical controls are in place to protect the data from unauthorized access and misuse? Explain.**

Data access for both public and internal agency staff is restricted using password-protected user accounts. Public users can only access data submitted by the account used to log into the system. USIBWC agency staff access data stored on an internal server that the public cannot access. All agency staff with a user account can view any data submitted on the Proponent Application Submittal Portal.

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## **Section 6.0: Data Maintenance and Retention**

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*The following questions address the maintenance and retention of records, the creation of reports on individuals, and whether a system of records is being created under the Privacy Act, 5 U.S.C. 522a.*

**6.1 How is data retrieved in the system or as part of the project? Can it be retrieved by a personal identifier, such as name, social security number, etc.? If yes, explain, and list the identifiers that will be used to retrieve information on the individual.**

For public users, data is retrieved by clicking on a link labeled with the application ID number. Public users can only see application IDs submitted by the account they used to log in.

For agency reviewers, a search function allows agency staff to retrieve data by entering any of the collected information that is stored in the database. For PII, this includes the proponent's name, telephone number, address, billing address, and email. Information that is uploaded in an external document (e.g. PDF, JPG, etc.) is not searchable in this manner.

**6.2 What kind of reports can be produced on individuals? What is the purpose of these reports, and who will have access to them? How long will the reports be maintained, and how will they be disposed of?**

The system can generate reports based on search results. The purpose would be to get a listing of applications with a specified status, such as those that are currently under active review. While the reports contain the PII listed under previous questions, the purpose is to generate information about a license/lease/permit application rather than generating information about individuals.

Reports are not stored within the system, instead they are available for export to agency desktops. How long they are maintained and disposed of is dependent on the user that created the report.

While reports are not stored, the data used to generate the report remain in the system so that agency staff can retrieve information for licenses, leases, and permits.

**6.3 What are the retention periods of data in this system? What are the procedures for disposition of the data at the end of the retention period? Under what guidelines are the retention and disposition procedures determined? Explain.**

GIS disposition and retention periods follow IBWC Records Management and NARA regulations.

**6.4 In the Federal Register, under which Privacy Act Systems of Record Notice (SORN) does this system operate? Provide number and name.**

N/A

**6.5 If the system is being modified, will the Privacy Act SORN require amendment or revision? Explain.**

N/A

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## **Section 7.0: Business Processes and Technology**

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*The following questions address the magnitude of harm if the system/project data is inadvertently disclosed, as well as the choices the agency made regarding business processes and technology.*

**7.1 Will the system aggregate or consolidate data in order to make privacy determinations or derive new data about individuals? If so, what controls are in place to protect the newly derived data from unauthorized access or use?**

No.

**7.2 Is the system/project using new technologies, such as monitoring software, SmartCards, Caller-ID, biometric collection devices, personal identification verification (PIV) cards, radio frequency identification devices (RFID), virtual data rooms (VDRs), social media, etc., to collect, maintain, or track information about individuals? If so, explain how the use of this technology may affect privacy.**

No.

**7.3 Will the system/project provide the capability to monitor individuals or users? If yes, describe the data being collected. Additionally, describe the business need for the monitoring and explain how the information is protected.**

No.

**7.4 Explain the magnitude of harm to the agency if privacy-related data in the system/project is disclosed, intentionally or unintentionally. Would the reputation of the agency be affected?**

Minimal. The portal does not collect anything beyond name, address, billing address, phone number, and email. It does not collect social security numbers or any financial account information.

**7.5 Did the completion of this PIA result in changes to business processes or technology? If yes, explain.**

Yes. The IMD will provide the recommendations from section 2.1 to Executive Management of the USIBWC. Any approved recommendations will be converted into action items and tracked by the SOAP and the IMD. PIA assessments are a good reminder to identify privacy risks and integrate privacy protections and mitigate vulnerabilities.

**Additional Notes:**

# Privacy Impact Assessment Authorization Memorandum

(Note: Do not route this form for signature until you have received approval from the IMD Staff.)

This system or application was assessed and its Privacy Impact Assessment approved for publication.

  
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**Ruy Martinez**  
Project / Program Manager

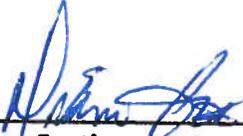
02/16/2017  
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Reviewing Official

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Date