

**DEPARTMENT OF STATE
PRIVACY IMPACT ASSESSMENT**

**PROTECTIVE LIAISON CASE TRACKING SYSTEM
(POLCATS)
Update April 2008**

Conducted by:
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A. GENERAL INFORMATION ABOUT THE SYSTEM/APPLICATION:

- 1) Does this system collect, maintain or disseminate personally identifiable information about individual members of the public**?

YES X NO

** "Personally identifiable information from/about individual members of the public" means personally identifiable information from/about "any person not acting in his/her official capacity as a federal government employee/contractor".

- 2) Does a Privacy Act system of records already exist?

YES X NO

If yes, please provide the following:

System Name Diplomatic Security Records Number STATE-36

- 3) What is the purpose of the system/application?

The POLCATS assists the Bureau of Diplomatic Security's Protective Liaison Branch (DS/P/PL). POLCATS stores information about current and closed case investigations made by the special agents in the Protective Liaison Division.

POLCATS:

- Provides information about the subject of each case, the progress of the investigation, agents attached to each case, and related information about each case. Separate screens allow the user to enter information about case activities and record cross-references to the case.
- Allows the user to review all the information associated with a case, or review just the activities, case agents or reference information. The user can retrieve specific cases by name, agent(s) associated with them, FOC number, or by the reference name type.
- Generates separate case reports sorted by agents, FOC numbers, monthly status of cases, classification, cases overdue, archived cases.

POLCATS is able to provide the following features:

- Track case status through the use of activities;
- List cases by agents, activities, and/or references;
- Allow users to search and edit all data pertaining to a case in the system;
- Control user access;
- Validate data through use of reference files;
- Provide preformatted reports; and
- Provide administrative functions to change the year and POLCATS number.

4) What legal authority authorizes the purchase or development of this system/application?

The legal authorities as documented in STATE-36, Diplomatic Security Records.

B. DATA IN THE SYSTEM:

1) What categories of individuals are covered in the system?

The categories of individuals covered by the system are documented in STATE-36, Diplomatic Security Records

2) What are the sources of the information in the system?

a. Who/what is the source of the information?

The source of the information is the individual or law enforcement agency(ies).

b. What type of information is collected from the source of the information?

POLCATS stores information about current and closed case investigations made by the special agents in the Protective Liaison Division of the Bureau of Diplomatic Security. The system provides information about the subject of each case, the progress of the investigation, names of agents attached to each case, and other related information about the case.

POLCAST captures data specific to an individual case (e.g., name; driver license number; date of birth; citizenship; and other biographical information relating to the individual under investigation).

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOS records be verified for accuracy?

The agency or source providing the information is responsible for verifying accuracy of the date. In this case it is the Bureau of Diplomatic Security (DS).

b. How will data be checked for completeness?

Completeness of data will be checked through investigations and/or through personal interviews of the source of the information.

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Investigations and/or through personal interviews will confirm whether data is current.

C. INTENDED USE OF THE DATA:

1) Will the use of the data be both relevant and necessary to the purpose for which the system is being designed?

POLCATS stores POLCATS provides information about the subject of each case, the progress of the investigation, agents attached to each case, and related information about the case. The system stores information about current and closed case investigations made by the special agents in the Protective Liaison Division of the Bureau of Diplomatic Security.

POLCATS allows the user to review all the information associated with a case, or review just the activities, case agents or reference information. The user can retrieve specific cases by name, agents associated with them, FOC number, or by the reference name type.

POLCAST captures data specific to an individual case (e.g., name; driver license number; date of birth; citizenship; and other biographical information relating to the individual under investigation).

2) Will new data or previously unavailable personal data be created through derived data or aggregation of data collected, and how will it be maintained and filed?

Yes. An aggregation of data from other federal agencies may be gathered to provide a complete picture of the individual under investigation.

3) Will the system make determinations about DOS employees or members of the public that would not be possible without the new data?

Yes. The information will assist in the determination whether to allow members of the Diplomatic community to proceed with criminal charges if warranted.

4) Will the new data be placed in the individual's record?

Yes. The information will be added to the biographical information maintained for the individual.

5) How will the new data be verified for relevance and accuracy?

Verification will be made through investigations and/or personal interviews.

6) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

The identification of data pertaining to an individual is retrieved by use of a personal identifying number (PIN) assigned by the system.

7) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

Various reports are provided by the system for statistical, law enforcement, and management purposes by Department of State personnel. The data is to be handled as Sensitive but Unclassified and not for release outside the Department without prior approval.

D. MAINTENANCE OF DATA & ADMINISTRATIVE CONTROLS

1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

The System is operated only at State Annex-20 (SA-20).

2) What are the retention periods of data in this system?

The retention period of data is consistent with established Department of State policies and guidelines as documented in the Department's Disposition Schedule of Diplomatic Security Records, Chapter 11.

3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

The retention period of data is consistent with established Department of State policies and guidelines as documented in the Department's Disposition Schedule of Diplomatic Security Records, Chapter 11.

4) Is the system using technologies in ways that the DOS has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No.

5) How does the use of this technology affect public/employee privacy and does it restrict access to the system?

There is no additional or new effect to privacy. Yes, access restrictions are in place.

- 6) **If this system provides the capability to identify, locate, and monitor individuals, what kinds of information are collected as a function of the monitoring of individuals and what controls are used to prevent unauthorized monitoring?**

No, the system does not provide the capability to identify, locate, and monitor individuals.

- 7) **If the system is being modified, will the Privacy Act system of records Notice require amendment or revision? Explain.**

At this time, there is no plan to modify POLCATS, to the point where a new system of records notice is required. The current system of records is sufficient.

- 8) **Are there forms associated with the system? YES ___ NO X___**
If yes, do the forms include Privacy Act statements that include required information (e.g. – legal authorities allowing for the collection of the information being requested, whether provision of the information is mandatory or voluntary, the routine uses of the data, with whom the data will be shared, the effects on the individual if the data is not provided)?

F. ACCESS TO DATA

- 1) **Who will have access to the data in the system (e.g., contractors, users, managers, system administrators, developers, other)?**
Access to the data in the system is on a “need-to-know” basis and/or under routine use criteria as explained in STATE-36.
- 2) **What are the criteria for gaining access to the system? Are criteria, procedures, controls, and responsibilities regarding access documented?**
A criterion for gaining access to the system is based on a “need-to-know.” Criteria, procedures, controls, and responsibilities regarding access are all documented.
- 3) **Will users have access to all data on the system or will the user’s access be restricted? Explain.**
Access is restricted to a “need to know” basis, specific to work related responsibilities.
- 4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those already having access? (Please list processes and training materials.)**
The system provides a means of limiting access to areas within the application based on user ID, password, and a “need-to-know.” Moreover, the Bureau of Diplomatic Security employees and contractors must follow the System Behavior Rules established by the Department of State.
- 5) **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? Yes.**

If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed? Yes.

Have rules of conduct been established and training regarding the handling of such information under the Privacy Act of 1974, as amended? Yes.

- 6) Will other systems share data or have access to the data in the system? If yes, who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

No.

- 7) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)? If so, how will the data be used by the other agency?**

Other agencies will not have direct access to the data but the data may be shared with an agency upon request if that agency is listed as a routine user in STATE-36. The use of the data by the other agency will be restricted to the same purpose for which the data was originally collected.

- 8) Who is responsible for assuring proper use of the SHARED data?**

The agency receiving the information is responsible for adhering to lawful restrictions concerning handling and sharing of the data.