



## 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:** Trust Evaluation System (TES) Decommissioning

**Bureau/Office:** Bureau of Trust Funds Administration

**Date:** September 30, 2022

**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?**

The Trust Evaluation System (TES) was a web-based software application intended to be utilized by the Office of Trust Review and Audit (OTRA) within the Bureau of Trust Funds Administration (BTFA) for purposes of conducting trust evaluations. The evaluations are critical work performed on behalf of the Secretary of the Department of the Interior (DOI) and the



BTFA to ensure tribes and the Bureau of Indian Affairs (BIA) are in compliance with Federal regulations and fiduciary trust standards, as defined by Federal laws. The purpose of TES was to collect data and documentation from tribes and the BIA to evaluate their compliance with Federal regulations, statutes, and policies in the management of Indian trust programs.

TES was developed for the tribes and the BIA to interactively participate in trust evaluation processes by answering compliance questions, uploading documentation and submitting data to OTRA via the TES. The use of the data contained in TES was to perform administrative and mission related trust evaluation functions.

TES was developed but never completed or used. Therefore, TES was not operational and PII was not collected, and has been decommissioned. TES was removed from the DOI system inventory in accordance with the applicable DOI directives.

BTFA developed a system decommission plan to ensure TES was decommissioned in a secure and auditable manner. A system inventory was completed which included all components within the authorization boundary of the TES including hardware disposition, closure of Plan of Actions and Milestones (POA&Ms), and archival of system documentation including software archive as required by NIST SP-800-88, Guidelines for Media Sanitization. Both the file server and SQL server were properly transferred to BTFA, deleted from the contractor network, and servers were wiped so the data became unrecoverable; Data/Documentation Archive was completed by performing data sanitization and completion of DI-1941 form, Documentation of Temporary Records Destruction, System documentation (archived) in accordance with the DOI records management policies and applicable National Archives and Records Administration policies for records retention. All records and electronic storage media maintained by the contractor were securely destroyed and transferred to BTFA. The software, hardware, and data are properly archived, disposed, or incorporated into appropriate receiving system(s).

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

The American Indian Trust Fund Management Reform Act of 1994 (P.L. 103-412), 108 Stat. 4239; 25 U.S.C. 4043; Tribal Self Governance Act of 1994 (25 U.S.C. 458cc(d)); 25 CFR 1000.350 (Trust Evaluations).

### **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*



TES is not in use, decommissioned, and was never operational. No data was collected or maintained by TES.

**E. Is this information system registered in CSAM?**

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

UII Code: 010-000001874; Trust Evaluation System (TES) System Security and Privacy 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)*

INTERIOR/OS-02, Interior, Individual Indian Money (IIM) Trust Funds SORN, 84 FR 4321 (August 23, 2019), which may be viewed on the DOI SORN website at <https://www.doi.gov/privacy/os-notices>.

No

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

Yes: *Describe*

No