

**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: Everglades National Park Boater Education Program Bureau/Office: National Park Service, Everglades National Park, IT Point of Contact: July 13, 2021 Name: Felix Uribe Title: NPS Associate Privacy Officer Email: nps\_privacy@nps.gov Phone: 202-354-6925 Address: 12201 Sunrise Valley Drive, Reston VA 20192

### Section 1. General System Information

#### A. Is a full PIA required?

 $\boxtimes$  Yes, information is collected from or maintained on

- □ Members of the general public
- □ Federal personnel and/or Federal contractors
- $\Box$  Volunteers
- 🛛 All
- □ No: Information is NOT collected, maintained, or used that is identifiable to the individuals 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 Everglades National Park (EVER) encompasses 1,509,000 acres, including the largest designated wilderness area east of the Rocky Mountains. The park's marine areas are renowned as a world-class fishery for many important gamefish species. The park's marine resource areas total over 550,000 acres, more than one-third of the park acreage.



The boater education program for the park's marine waters is a key part of the broad goals and strategies being implemented to increase protection and enhancement of the park's marine resources and related visitor experiences. The need for this program is based on strong public concern for marine resources protection, the quality of visitor experiences in these areas, as well as scientific information gathered regarding natural resource and wilderness resource conditions, and ever-increasing levels of use.

The National Park Service, EVER has signed a cooperative agreement with Indiana University's Eppley Institute for Parks and Public Lands to develop, implement, maintain, manage and host an online Learning Management System (LMS) on the proValens Learning platform for EVER boater education program. The LMS will perform two critical functions for the EVER boater education program. First, it will allow any member of the public to take a boater education course and receive an EVER boater's certificate for use in park marine waters upon successful completion of the course. Second, it will allow EVER Law Enforcement (LE) personnel to determine if a certificate presented by a boater is valid.

Indiana University's Eppley Institute for Parks and Public Lands does not share any of the Personally Identifiable Information (PII) collected by the system with the National Park Service (NPS) or EVER. Records such as boater education account information, certificates of course completion and certificate data, are collected and maintained by the Eppley Institute on behalf of the NPS. However, EVER will receive summary reports consistent with the maintenance agreement with the Eppley Institute, such as: the number of people taking the class and/or receiving a certificate each month, number of people using the Eppley Institute help desk, general feedback topics, but will not receive any information specific to an individual taking the course or getting a certificate that includes PII or other specific, identifiable information.

Only EVER LE personnel will have the ability to securely login into the LMS portal and enter a certificate number (which will be a unique identifier number, i.e., random numbers and letters) to determine if a certificate presented by a boater is valid. The information displayed to the LE staff obtained from the LMS will be compared against the physical certificate presented by the boat operator (printed or electronic, as required) and/or government issued document (e.g., driver's license, boat registration) to ensure the boater complies with the boater education program requirements; however, these documents are not collected or maintained in the system. Taking the boater education course and receiving a certificate will be a requirement for operating a motorboat in park marine waters and will be free of charge.

The Eppley Institute is Indiana University's unique outreach program for park, active living, and protected lands management profession, focused on enhancing the quality of natural, cultural, and recreational experiences for all people in the state, nation, and



world. The Eppley Institute's experts and services are unsurpassed, including Public Engagement and Outreach, Research, Website Services, Master and Strategic Planning, Training and Education for the Park, recreation community health and protected area organizations around the world.

### C. What is the legal authority?

36 CFR 1.5, Closures and public use limits; Wilderness Act of 1964 (16 U.S.C. Chapter 23, National Wilderness Preservation System); the Endangered Species Act of 1973 (16 U.S.C. Chapter 35); and the 2015 EVER General Management Plan/East Everglades Wilderness Study/Environmental Impact Statement Record of Decision (approved October 23, 2015).

#### 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*

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

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

UII Code: 010-000001896. EVER Boater Education Program System, Security and Privacy Plan.

 $\Box$  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	Describe
	_	(Yes/No)	If Yes, provide a
			description.
NONE	N/A	N/A	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/DOI-16, Learning Management System - October 9, 2018, 83 FR 50682

 $\square$  No

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

 $\square$  Yes: *Describe*  $\boxtimes$  No

### Section 2. Summary of System Data

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

☑ Name
☑ Personal Cell Telephone Number
☑ Personal Email Address
☑ Mailing/Home Address
☑ Other: Specify the PII collected.

Users self register and create unique userid and password to create system user accounts. The PII required to create and manage a user account includes the individual's name, username, and password.

NPS is the data and program owner. Indiana University's Eppley Institute for Parks and Public Lands manages and processes the data on behalf of the NPS. NPS is responsible for ensuring that all data and processes are consistent with Federal laws and policies. The Eppley Institute does not share PII collected as part of the regular and routine administration of this program with the NPS. If there is a need for the NPS to access the data maintained by the Eppley Institute for reasons beyond the regular and routine administration of the program, the Eppley Institute will comply with that request.

#### 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*

#### 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
Other: Describe

Individuals participating in the EVER boater education program will access the LMS website to provide their information. Any person will be able to register for and take the boater education course and get a certificate upon successful completion of the course.

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

The intended use of the PII collected is to 1) allow any member of the public to complete the EVER Boater Education Program as administered by the Eppley Institute, 2) allow motorboat operators to receive a EVER boat operator's certificate to allow proper use of park marine waters, and 3) allow the Eppley Institute to communicate with individuals taking the course and having a certificate to provide program updates (e.g., revised or new course content that boaters should know).

NPS is the data and program owner. Indiana University's Eppley Institute for Parks and Public Lands manages and processes the data on behalf of the NPS. NPS is responsible for ensuring that all data and processes are consistent with Federal laws and policies. The Eppley Institute does not share PII collected as part of the regular and routine administration of this program with the NPS. If there is a need for the NPS to access the data maintained by the Eppley Institute for reasons beyond the regular and routine administration of the program, the Eppley Institute will comply with that request.

EVER will receive summary reports per the maintenance agreement with the Eppley Institute, such as: the number of people taking the class/month, number of people using the Eppley Institute help desk, general feedback topics, but will not receive any information regarding anyone taking a course or getting a certificate that includes PII or other specific identifiable information.



Only EVER LE personnel will have the ability to securely login into the LMS portal and enter a certificate number (which will be a unique identifier number, i.e., random numbers and letters) to determine if a certificate presented by a boater is valid.

# 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*. Eppley Institute for Parks and Public Lands at Indiana University, as a third-party cooperator and vendor, maintains the registration data affiliated with the EVER boater education program on behalf of NPS.

NPS is the data and program owner. Indiana University's Eppley Institute for Parks and Public Lands manages and processes the data on behalf of the NPS. NPS is responsible for ensuring that all data and processes are consistent with Federal laws and policies. The Eppley Institute does not share PII collected as part of the regular and routine administration of this program with the NPS, except only for the verification of certificate numbers and issuance dates, that will be shared with EVER LE officers through the LMS. If there is a need for the NPS to access the data maintained by the Eppley Institute for reasons beyond the regular and routine administration of the program, the Eppley Institute will comply with that request.

- □ 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.*
- □ 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 National Park Service, EVER has signed a cooperative agreement with Indiana University's Eppley Institute for Parks and Public Lands.

NPS is the data and program owner. Indiana University's Eppley Institute for Parks and Public Lands manages and processes the data on behalf of the NPS. NPS is responsible for ensuring that all data and processes are consistent with Federal laws and policies. The Eppley Institute does not share PII collected as part of the regular and routine administration of this program with the NPS, except only for the verification of certificate numbers and issuance dates, that will be shared with EVER LE officers through the LMS. If there is a need for the NPS to access the data maintained by the Eppley Institute for reasons beyond the regular and routine administration of the program, the Eppley Institute will comply with that request.



□ 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.

Individual opportunity to consent to or decline the collection or provision of personal information occurs at the time of registration for the course. Providing the information to Eppley is voluntary, however, failure to provide the requested information may impede individual participation in the EVER Boater Education Program.

□ 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 link to the Privacy Act Statement is provided to individuals when creating an account in the system. ProValens Learning is a website operated by the Eppley Institute for Parks and Public Lands. It is the online course catalog through which the Institute's e-courses and certificates can be purchased. The Privacy Act Statement can be viewed at https://provalenslearning.com/ever-privacy-policy.

☑ Privacy Notice: *Describe each applicable format*.

Any member of the public taking the boater education course and receiving an EVER boat operator's certificate for use in park marine waters will be subject to Eppley Institute's privacy practices and policies. Eppley Institute is responsible for the development and publication of their own privacy policies that are different from the National Park Service in accordance with Federal laws and policies.

EVER LE personnel will be presented with a Privacy Notice before they log in into the secured LMS portal in order to adhere to NPS Privacy policies and practices.

Notice is also provided to individuals through the publication of this privacy impact assessment and the system of records notice, INTERIOR/DOI-16, Learning Management System - October 9, 2018, 83 FR 50682 which may be viewed on the DOI SORN page at <u>https://www.doi.gov/privacy/sorn</u>.



□ 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.).

EVER LE personnel will have the ability to securely login into the LMS portal and enter a certificate number (which will be a unique identifier number, i.e., random numbers and letters) to determine if a certificate presented by a boater is valid. The information displayed to the LE staff obtained from the LMS will be compared against the physical certificate presented by the boat operator (printed or electronic, as required) and/or government issued document (e.g., driver's license, boat registration) to ensure the boater complies with the EVER boater education program requirements.

### 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?

It is the responsibility of the Eppley Institute to verify the accuracy and reliability of the information provided by the users of the system. Eppley collects the user's information, and maintains, manages and hosts the system in accordance with Federal laws and policies.

#### B. How will data be checked for completeness?

It is the responsibility of the Eppley Institute to check for completeness of the information provided by the users of the system. Eppley collects the user's information, and maintains, manages and hosts the system in accordance with Federal laws and policies.

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



Data will remain current and accurate as the system will be evaluated and revised annually based on the NPS - Eppley Institute Cooperative Agreement. In addition, the system is compliant with DOI Talent requirements; has 24/7 web site support; and several quarterly evaluations/reports for site hosting, browser upgrades, and usage summaries.

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

Eppley Institute for Parks and Public Lands at Indiana University, as a third-party cooperator and vendor, maintains (manages and processes) the registration data affiliated with the EVER Boater Education Program as defined by the NPS.

The registration data is tied to a system that is linked to other online training and learning programs. As a result, the data allow learners such as the participants to access past and new learning material on the system. Eppley's management practice for these data is to maintain a learner's record and access to prior and new training for seven years. Once a system is retired, all data is destroyed. Upon a written request from NPS, Eppley Institute for Parks and Public Lands may also destroy the data.

NPS records (reports provided by Eppley Institute) are maintained in accordance with the National Park Service Management and Accountability (Item 10), C. Routine Fiscal, Contracting, and Purchasing Records, Records Record Schedule (N1-79-08-9) which has been approved by the National Archives and Records Administration. Records are temporary and destroyed/deleted 7 years after closure.

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

Eppley Institute for Parks and Public Lands at Indiana University, as a third-party cooperator and vendor, owns and maintains (manages and processes) the registration data affiliated with the EVER Boater Education Program as defined by the NPS.

The Eppley Institute will retain the registration data for each boat operator's certificate within the system after the valid period expires. Eppley's management practice for the data is to maintain a learner's record and access to prior and new training for seven years. Should the registration system be retired before the seven-year retention period but after the valid certificate periods expire, the data may be archived, provided to NPS or destroyed. Procedures for disposition are documented in the system security plan for the system as defined by the NPS.

NPS records (reports provided by Eppley Institute) are maintained in accordance with the National Park Service Management and Accountability (Item 10), C. Routine Fiscal,



Contracting, and Purchasing Records, Records Record Schedule (N1-79-08-9) which has been approved by the National Archives and Records Administration. Records are temporary and destroyed/deleted 7 years after closure.

# 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.

Motorboat operators will utilize a secured training site managed by the Eppley Institute for Parks and Public Lands at Indiana University. There is a risk that erroneous information may be collected. Risks are being mitigated as much as possible for users however there is always a minor risk of data breaches. Boaters will be required to register with the site. Part of the registration process is to generate a unique user ID and password that will allow the system to restrict access and track their actions. During their session, boaters will only have access to their information and the courses that they have enrolled in. The system is categorized as a moderate system. There is a risk that user PII may be inappropriately used or disseminated by personnel authorized to access the system or view records. Only Eppley Institute's system administrators and authorized personnel will have access to the data. Access to the data will be assigned on a need to know basis, and access or changes will be tracked by the individual's unique credentials. Audit logs will be reviewed on a regular basis to ensure that unauthorized access to data has not occurred. Eppley Institute's staff members are required to complete annual privacy training ensuring that all end users are properly trained.

There are privacy risks related to hosting, processing and sharing of data, unauthorized access to records, or any inappropriate use and dissemination of information. Encrypted data reside on the Indiana University/Eppley Institute server utilized within a secured facility. The data is not shared with anyone outside of the Eppley Institute. Once the retention period of 7 years has ended, data may be archived, provided to the NPS or destroyed.

Eppley Institute will maintain an audit log of this system, tracking the records accessed. As part of Eppley's summary reporting requirements under the project's maintenance agreement, the park will receive summary information of the number of records accessed in this database.

There is a risk that unauthorized persons could potentially gain access to the PII on the system or misuse the data. Eppley Institute utilizes a user access control process providing access to the data on a need to know basis only. Users will have access to only the data that they have been granted access to. Unique credentials will be used to restrict and identify the users that have access to the system.



There are privacy risks related to hosting, processing and sharing of data, unauthorized access to records, or any inappropriate use and dissemination of information. Eppley Institute has hardened data centers behind firewalls, one each on the Bloomington and Indianapolis campuses. The Data Centers provide a safe and secure location for IT equipment. This includes the basic infrastructure of standardized cabinets and cabinet distribution units for power. Additionally, the Data Centers have uninterruptible power supplies (UPS), power distribution, and HVAC to provide year-round cooling and protect equipment from environmental hazards of dust, temperature, and humidity. Diesel generators will provide ongoing power in the event of a campus or Data Center power outage. Enhanced cabinet power distribution provides redundant circuits and remote monitoring of the power distribution.

Physical security includes proximity card readers and biometric hand scanners for access authentication, ID cards, reinforced doors, security glass, and alarms. Fire suppression equipment is provided by a double inter-lock pre-action sprinkler system. Additionally, both facilities have University Information Technology Services staff on site in the building 24 hours a day, 7 days a week.

Additionally, a default layer of data protection is included as part of the storage subsystem where the server is hosted. All storage servicing the environment leverages encryption at rest as part of the base installation. Privacy notices are posted on the system, audit logs capture and track end user actions, and end users at Eppley Institute receive training and follow a written set of rules and behavior. Courses taken by Eppley Institute project managers and IT staff include: Records Management Awareness and Section 508; Privacy Awareness Training; Controlled Unclassified Information; Awareness Training (IMT), DOI Rules of Behavior and Warning Banner; Desk References: Cybersecurity, FISSA, Section 508, Records Management, Privacy, CUI & Quiz; Access to Public Records Act (APRA) Training; HIPAA Privacy and Security 2017-18.

EVER LE personnel will have the ability to securely login into the LMS portal and enter a boat operator's certificate number. The connection is encrypted using Transport Layer Security (TLS). NPS does not store or collect the information displayed to the LE staff to ensure the boater complies with the EVER Boater Education Program requirements. EVER LE personnel are required to complete privacy, security, records management, and CUI training on an annual basis, as well as role-based privacy training and acknowledge DOI Rules of Behavior, in accordance with Federal and DOI policy.

### 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 system is designed to increase protection of important park resources and enhance visitor enjoyment in the park. Through the General Management Plan (approved in 2015) it was determined that a mandatory boater education program was needed to fulfill the Park's mission and support these resource protection and visitor goals. As a result, this system was designed to be the most efficient and effective way to deliver the critical information to motorboat operators and maintain their proficiency with the boater education program, which includes the issuance of a boat operator certificate.

This system will provide clear understanding to boaters in order to protect lands and waters covered by applicable federal laws, regulations and policies.

 $\square$  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?

The system 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.*

 $\boxtimes$  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

EVER LE personnel will have the ability to securely login into the LMS portal and enter a certificate number (which will be a unique identifier number, i.e., random numbers and letters) to determine if a certificate presented by a boater is valid.

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

Website users (Park visitors and boaters required to participate in the boater education program and secure a certificate) will have access to review educational course information, determine date(s) of the courses they enrolled in, the educational course content, ability to acquire their certificate, and the dates for their certificate as required.

Only EVER LE personnel will have the ability to securely login into the LMS portal and enter a certificate number (which will be a unique identifier number, i.e., random numbers and letters) to determine if a certificate presented by a boater is valid. The information displayed to the LE staff obtained from the LMS will be compared against the physical certificate presented by the boat operator (printed or electronic, as required) and/or government issued document (e.g., driver's license, boat registration) to ensure the boater complies with the boater education program requirements.

Eppley Institute will maintain an audit log of this system, tracking the records accessed. As part of Eppley's summary reporting requirements under the project's maintenance agreement, the park will receive summary information of the number of records accessed in this database.



Eppley Institute utilizes a user access control process providing access to the data on a need to know basis only. EVER LE personnel will have access to only the data that they have been granted access to. Unique credentials will be used to restrict and identify the users that have access to the system.

# 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 National Park Service, EVER signed a cooperative agreement with Indiana University's Eppley Institute for Parks and Public Lands. Cooperative agreements are not governed by the Federal Acquisition Regulation (FAR) they are under the 2 CFR 200. NPS does not reference anything from the FAR in any of its agreements. However, the recipient signs the agreement that references:

"Acceptance: Acceptance of a Federal Financial Assistance award from the Department of the Interior carries with it the responsibility to be aware of and to comply with the terms and conditions of award as referenced in this agreement, applicable Assurances (SF424B) and in accordance with applicable Financial Assistance regulations including CODE OF FEDERAL REGULATIONS 2 CFR 200."

As such, the recipient signs acceptance to 2 CFR 200.79 Personally Identifiable Information (PII), 2 CFR 200.82 Protected Personally Identifiable Information (Protected PII), 200.337 Restrictions on Public Access to Records.

□ No

# J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

 $\Box$  Yes. *Explanation* 

⊠ No

### K. Will this system provide the capability to identify, locate and monitor individuals?

#### $\boxtimes$ Yes. Explanation

Each user of the program will have their own unique credentials. The system will track successful logon, logon date, failed logon attempts, files accessed, and any action taken



using the individual's unique credentials (ID and password). The system will also log the Internet Protocol (IP) of the system that is attempting to access the Eppley Institute site.

□ No

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

Successful logon, logon date, failed logon attempts, files accessed, and any action taken by an individual accessing the boater education program with their unique credentials (ID and password). The system will also log the IP of the system that is attempting to access the Eppley Institute's site.

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

Eppley Institute has hardened data centers behind firewalls, one each on the Bloomington and Indianapolis campuses. Physical security includes proximity card readers and biometric hand scanners for access authentication, ID cards, reinforced doors, security glass, and alarms. Additionally, both facilities have University Information Technology Services staff on site in the building 24 hours a day, 7 days a week.

Additionally, a default layer of data protection is included as part of the storage subsystem where the server is hosted. All storage servicing the environment leverages AES-256 encryption at rest as part of the base installation. Privacy notices are posted on the system, audit logs capture and track end users actions, and end users at Eppley Institute receive training and follow a written set of rules and behavior. Courses taken by Eppley Institute project managers and IT staff include: Records Management Awareness and Section 508; Privacy Awareness Training; Controlled Unclassified Information; Awareness Training (IMT), DOI Rules of Behavior and Warning Banner; Desk References: Cybersecurity, Section 508, Records Management, Privacy, CUI & Quiz; Access to Public Records Act (APRA) Training; HIPAA Privacy and Security 2017-18.

### 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*

Eppley Institute has hardened data centers behind firewalls, one each on the Bloomington and Indianapolis campuses. The Data Centers provide a safe and secure location for IT equipment. This includes the basic infrastructure of standardized cabinets and cabinet distribution units for power. Additionally, the Data Centers have uninterruptible power supplies (UPS), power distribution, and HVAC to provide year-round cooling and protect equipment from environmental hazards of dust, temperature, and humidity. Diesel generators will provide ongoing power in the event of a campus or Data Center power outage. Enhanced cabinet power distribution provides redundant circuits and remote monitoring of the power distribution.

Physical security includes proximity card readers and biometric hand scanners for access authentication, ID cards, reinforced doors, security glass, and alarms. Fire suppression equipment is provided by a double inter-lock pre-action sprinkler system. Additionally, both facilities have University Information Technology Services staff on site in the building 24 hours a day, 7 days a week.

(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

A default layer of data protection is included as part of the storage subsystem where the server is hosted. All storage servicing the environment leverages AES-256 encryption at rest as part of the base installation. Privacy notices are posted on the system, audit logs capture and track end users actions. Biometrics for access control, security glass and audio able alarms.

(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 EVER Boater Education Program Information System Owner and The Eppley Institute for Parks and Public Lands, Indiana University will be responsible for oversight and management of security controls and the protection of information processed and stored in the EVER Boater Education Program and the Eppley Institute for Parks and Public Lands. The System Owner is responsible for ensuring adequate safeguards are implemented to protect the privacy of the public and employees in compliance with Federal laws and policies for the information in the EVER Boater Education Program, in consultation with the NPS Associate Privacy Officer.

Eppley Institute for Parks and Public Lands at Indiana University, as a third-party cooperator and vendor, owns and maintains (manages and processes) the registration data affiliated with the EVER Boater Education Program as defined by the NPS.

# 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 EVER Boater Education Program Information System Owner and The Eppley Institute for Parks and Public Lands, Indiana University will be responsible for daily operational oversight and management of the system's security and privacy controls, for ensuring to the greatest possible extent that the data is properly managed and that all access to the data has been granted in a secure and auditable manner. The System Owner and Information System Security Officer for the EVER Boater Education Program Information System Owner and The Eppley Institute for Parks and Public Lands are responsible for ensuring that any loss, compromise, unauthorized disclosure of PII, or unauthorized access of privacy protected information is reported to DOI-CIRC, DOI's incident reporting portal, and appropriate DOI officials in accordance with DOI policy and established procedures.



Eppley Institute for Parks and Public Lands at Indiana University, as a third-party cooperator and vendor, owns and maintains (manages and processes) the registration data affiliated with the EVER Boater Education Program as defined by the NPS.