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: Lotus Notes Minor Application Decommissioning
Bureau/Office: Office of the Chief Information Officer
Date: June 6, 2017
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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?

Lotus Notes was the primary email system for the Department of the Interior (DOI) Office of the Secretary (OS) and the Interior Business Center (IBC) before migration to the BisonConnect – Google Apps for Government (BisonConnect-GAfG), the enterprise-wide email application. The Lotus Notes environment is comprised of three components:

- Collaborative Work Space (CWS) - Users in a collaboration group stored files and shared information with others in the same group which is similar to SharePoint or Google Drive or Sites. Content in this component is comprised of different groups within IBC.
- Lotus Notes Applications - Supported workflow or other similar business function.
- Email and Calendar - Common email and electronic calendar functions to support OS, IBC and the Financial and Business Management System (FBMS).

The Lotus Notes system is decommissioned. Below is a description of the decommissioning of the software, hardware, and data.

Software Archive:
The Lotus Notes Applications were backed up using IBM Tivoli Data Protection (TDP) for Domino in conjunction with the IBM Tivoli Store Manager (TSM) Backup/Archive Client.

Documentation Archive:
Over the course of hosting the Lotus Notes Applications, multiple platforms and operating systems were utilized. If tape restoration of any data is required, a third party vendor will need to be engaged through the acquisitions process to build the appropriate environment to perform the restoration in a Disaster Recovery type scenario. Utilizing the Disaster Recovery hardware, a TSM server would have to be set up and the TSM database would have to be restored from tapes. Files or directories would be restored using the TSM Backup/Archive Client. Finally, Lotus Notes data would be restored using TDP for Domino.

Hardware Disposition:
The DOI production servers that host the Lotus Notes environment have been shut down and removed. The hardware will be sanitized and surplussed per appropriate NIST guidance. Virtual Machine (VM) Linux "guests/servers" are deleted and their resources returned to the VMWARE environment for use.

Data Archive:
The Lotus Notes archive is a description of disposition of the email components of Lotus Notes Applications. The format of email in the Lotus Notes system is a database format - each individual mailfile and archive mailfile was in a separate database file. All of the mailfile databases and mailfile archive databases were migrated to Google Apps for Government (BisonConnect). The mailfile and mailfile archives were also backed up to tape and are currently stored offsite. Lastly, the Lotus Notes systems archived all email in real-time to the Zantaz repository. The Zantaz repository was further copied into the eMail Enterprise Records Document Management System (eERDMS).

The Collaborative Work Space components were never under the "indefinite retention" requirements due to the Cobell litigation, therefore, there are no backup of CWS at Iron Mountain at this time. A full backup of CWS was completed on May 29, 2014 as part of the decommissioning and retained for one year and disposed of in accordance with the disposition schedule.

C. What is the legal authority?

5 U.S.C. 301, Departmental Regulations; 44 U.S.C. Chapter 35, the Paperwork Reduction Act; 40 U.S.C. 1401, the Clinger-Cohen Act; 44 U.S.C. 3541 et seq., Federal Information Security Modernization Act of 2014; OMB Circular A-130, Managing Information as a Strategic Resource; Executive Order 13571, "Streamlining Service Delivery and Improving Customer Service," April 11, 2011; Presidential Memorandum, "Security Authorization of Information Systems in Cloud Computing Environments," December 8, 2011; and Presidential Memorandum, "Building a 21st Century Digital Government," May 23, 2012

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*

010-000000343; Lotus Notes system was part of the DOI - Infrastructure - Messaging and Collaboration investment.

☐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)*
☒No

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

☐Yes: *Describe*
☒No

Section 2. Summary of System Data

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

☒Other: *Specify the PII collected.*

This legacy system is no longer used to collect or maintain personally identifiable information (PII). The Lotus Notes Applications data have been archived onto backup tapes/disks and are currently stored within an Iron Mountain facility. The original hard drives were removed from the supporting Mainframe and are also in storage.

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*

This legacy system is no longer used to collect or maintain PII. Lotus Notes system has been decommissioned and the email and application data was successfully migrated or archived.

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*

This legacy system is no longer used to collect or maintain PII. Lotus Notes system has been decommissioned and the data was successfully migrated or archived.

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

Not applicable as Lotus Notes system has been decommissioned and is no longer used to collect or maintain PII.

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.*

Not applicable as the Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

☒Other Bureaus/Offices: *Describe the bureau/office and how the data will be used.*

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

☒Other Federal Agencies: *Describe the federal agency and how the data will be used.*

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

☒Tribal, State or Local Agencies: *Describe the Tribal, state or local agencies and how the data will be used.*

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

☒Contractor: *Describe the contractor and how the data will be used.*

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

☒Other Third Party Sources: *Describe the third party source and how the data will be used.*

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

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.*

☒No: *State the reason why individuals cannot object or why individuals cannot give or withhold their consent*

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

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.*

☐Privacy Notice: *Describe each applicable format.*

☐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.).

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

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?

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

B. How will data be checked for completeness?

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

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

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

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

The Lotus Notes system has been decommissioned and is no longer used to collect or maintain PII. The Lotus Notes Applications data have been archived onto backup tapes/disks and are currently stored within an Iron Mountain facility. The original hard drives were removed from the supporting Mainframe and are also in storage. Lotus Notes email, itself, did not have a records schedule. The Lotus Notes system fell under the OS/IBC Denver Data Center General Support System (GSS) and the OS/IBC Reston Data Center GSS. Any Federal records sent, received, or stored in the Lotus Notes system would have fallen under the applicable records schedule for the content.
All Lotus Notes Applications are mapped to an existing records disposition schedules. The Indian Fiduciary Trust Records are retained permanently according to 303 Departmental Manual Section 6.6.

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

The Lotus Notes system has been decommissioned and is no longer used to collect or maintain PII. The Lotus Notes Applications data have been archived onto backup tapes/disks and are currently stored within an Iron Mountain facility. The original hard drives were removed from the supporting Mainframe and are also in storage.

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.

Lotus Notes has been decommissioned with proper disposition or migration of software, hardware, documentation, and data. This legacy system no longer collects or maintains PII. The Lotus Notes Applications data have been archived onto backup tapes/disks and are currently stored within an Iron Mountain facility. The original hard drives were removed from the supporting Mainframe and are also in storage. All Lotus Notes Applications would be mapped to an existing records disposition schedules.

There are potential risks in the migration of CWs and Lotus Notes Application data that were provided by the data owners, which cannot be verified. After the backup tapes are destroyed, this data may not be retrieved. The Zantaz archive that was migrated to eERDMS will be the only means to retrieve e-mail and calendar data from February 2002 to May 2013. While validation has been performed that demonstrates that all Zantaz data was successfully migrated to eERDMS, it is difficult to validate if the Zantaz archiving from the Lotus Notes system was complete from February 2002 to May 2013.

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*
☒ 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 Lotus Notes system has been decommissioned and is no longer used to collect or maintain PII. The Lotus Notes Applications data has been archived onto backup tapes/disks and are currently stored within an Iron Mountain facility. The original hard drives were removed from the supporting Mainframe and are also in storage.

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 Lotus Notes system has been decommissioned and is no longer used to collect or maintain PII. The Lotus Notes Applications data have been archived onto backup tapes/disks and are currently stored within an Iron Mountain facility. The original hard drives were removed from the supporting Mainframe and are also in storage.

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

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

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?*

☒ 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?

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect or maintain PII.

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

Not applicable as Lotus Notes system has been decommissioned, and is no longer used to collect
or maintain PII.

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*

The Lotus Notes system has been decommissioned. The Lotus Notes Applications data have been
archived onto backup tapes/disks and are currently stored within an Iron Mountain facility. The
original hard drives were removed from the supporting Mainframe and are also in storage. Physical
controls have been put in place to protect the data.

(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*

Not applicable as the legacy system has been decommissioned, and is no longer used to collect or
maintain PII.

(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 Chief, End User Services Branch serves as the Lotus Notes Information System Owner and the official responsible for oversight and management of security controls and the protection of the Lotus Notes system. The Information System Owner is responsible for addressing privacy rights and complaints, and ensuring adequate safeguards are implemented in compliance with Federal laws and policies, in consultation with the Departmental Privacy Officer.

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 Lotus Notes Information System Owner is responsible for daily operational oversight and management of the Lotus Notes system and for ensuring to the greatest possible extent that security and privacy controls are implemented to properly manage and safeguard data and access is granted in a secure and auditable manner. The Lotus Notes Information System Owner and Information System Security Officer are responsible for ensuring that any loss, compromise, unauthorized access or disclosure of PII is reported to DOI-CIRC, DOI's incident reporting portal, and appropriate DOI officials in accordance with DOI policy and established procedures.