



## 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:** National Fluids Lease Sale System (NFLSS)  
**Bureau/Office:** Bureau of Land Management (BLM), WO310  
**Date:** September 29, 2017  
**Point of Contact:** July S. McQuilliams  
Name: July S. McQuilliams  
Title: BLM Senior Mineral Leasing Specialist  
Email: [jmcquilliams@blm.gov](mailto:jmcquilliams@blm.gov)  
Phone: (202) 912-7156  
Address: 20 M Street, SE, Washington DC 20003

### 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 National Fluids Lease Sale System (NFLSS) supports the Bureau of Land Management (BLM) administration of the leasing program for Federal onshore oil and gas and geothermal leasing. Public users access NFLSS to nominate land (by electronically submitting Expressions of Interest, or EOIs). Internal users (authenticated) research and evaluate the availability of the land for leasing.



The NFLSS provides the ability to record and track EOI acreages deferred and protested parcels and to provide national reporting capability to satisfy the full business needs/program requirements. These benefits will reduce burden on the public, increase the efficiency of the leasing program, and provide better service to the public.

The lease sale process is the initial phase in oil and gas and geothermal leasing which leads to oil and gas and geothermal exploration and production. As required by the Federal Onshore Oil and Gas Leasing Reform Act of 1987 (FOOGLRA) and 43 CFR §3120, each BLM state office shall hold competitive oil and gas lease sales at least quarterly if eligible lands are available for competitive leasing. In addition, as required by the Energy Policy Act of 2005, Section 222 and 43 CFR §3203.13, the BLM will hold a competitive geothermal lease sale at least once every two years for lands available for leasing in a state that has nominations pending.

The NFLSS is a single system with two subsystems, one is the public facing NFLSS Public Portal and the other is the internal NFLSS site. A nominator submits data on the public side and BLM staff research and review the nomination on the internal site. The privacy impacts of the public portal and the internal NFLSS website will be addressed in this PIA.

### C. What is the legal authority?

In support of the *Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.)*, the BLM is establishing this system of records to provide and maintain a lands and minerals database system (which the NFLSS is part of) that will be used at most BLM facilities under *43 U.S.C. 1701, 42 U.S.C. 4601*.

In support of the *Federal Onshore Oil and Gas Leasing Reform Act of 1987 (30 U.S.C. § 181 et seq.)* and the *Energy Policy Act of 2005 (42 USC §13201 et seq.)*, collection of limited privacy data allows the nominating individuals to track their expressions of interest and monitor if and when nominated land may be offered for competitive lease.

### 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, 000001698, National Fluids Lease Sale System (NFLSS) System Security 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 <i>If Yes, provide a description.</i>
NFLSS Public Portal	Allows members of the public to submit and track Expressions of Interest	Yes	The NFLSS is a single system with two subsystems: the public facing NFLSS Portal and the internal NFLSS website. (The privacy impacts of both sites will be addressed in this PIA.)  If individuals wish to be notified, they must supply a name and address when submitting their nomination via the public portal.
NFLSS Internal Site	Allows BLM staff to manage nominations, conduct Oil & Gas Lease Sales pre-sale, day of sale, and post-sale activities, and track protest information	Yes	The nominations that are submitted by the public are managed in the internal NFLSS Site.  The nominating individual's contact information is available in the NFLSS internal site for follow up, if submitted.



**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)*

BLM-32, Land and Minerals Authorization Tracking System, 56 FR 5015, February 7, 1991

No

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

Yes: *Describe*

The OMB Control Number for the collection of information pertaining to 43 CFR parts 3100, 3120, and 3150, and Subpart 3162 is 1004-0185. The title is “Onshore Oil and Gas Leasing and Draining Protection,” with an Expiration Date of March 31, 2019.

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
- Home Telephone Number

**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*

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

The PII is collected so that BLM staff may contact the individual who has submitted an Expression of Interest in order to (1) request additional information, such as documentation needed to process the request, (2) notify the individual when the nominated lands are unavailable for leasing, (3) report status of EOI submission(s), and (4) provide information on upcoming Oil & Gas Lease Sale (live and internet auctions) for which the nominated lands will be included.

**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.*

The information is shared with State Office personnel who are involved in the lease sale activities, the Washington Office personnel who perform oversight of Oil & Gas leasing activities, Field Office staff who assist in reviews of lands that have been nominated, and persons who are involved in supporting the NFLSS web application (e.g., technical support staff, operations team members, individuals who will assist in writing reports). In addition, when Cadastral review or review by a Surface Management Agency (SMA) is required to process an EOI, the information is shared with Cadastral staff at the BLM state office.

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

PII will be shared with other Federal surface management agencies (Bureau of Reclamation, etc.). The BLM is required to obtain consent to leasing from other Federal surface management agencies when lands are nominated under their jurisdiction. Coordination between agencies is essential to ensure that mutual management goals and objectives for oil and gas exploration and development activities are achieved.

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

PII will be shared with other Federal surface management agencies (U.S. Forest Service, etc.). The BLM is required to obtain consent to leasing from other Federal surface management agencies when lands are



nominated under their jurisdiction. Coordination between agencies is essential to ensure that mutual management goals and objectives for oil and gas exploration and development activities are achieved.

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.*

Contractors who are responsible for deploying the system, migrating BLM oil and gas leasing data, and/or providing technical support to the system will view the data in the course of their software development, deployment, or operational support activities in support of the BLM users at Field Offices, District Offices, State Offices, and the Washington Office.

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.*

When submitting an EOI via the NFLSS Public Portal, the nominator (a member of the public) has the option of nominating lands anonymously and they are not required to provide their name or address. When a nominator chooses to skip the webpage to supply their contact information, a pop up window will have the following message “Anonymous Submission Notice - When submitting an Expression of Interest (EOI), you are not required to provide your name or address. You may still provide this information for contact purposes; however, the BLM will make this information available to the public. If you consider your name and address to be confidential, do not include it in your EOI. The BLM will release all EOIs to the public. In an effort to improve transparency, each state office will make all new EOI submissions available to the public on each state's public website. If you do not provide your contact information, the BLM cannot respond to you if any questions arise regarding your EOI.” The nominator then has the option to Cancel, and return to the webpage to enter their contact information, or Accept and continue to the next webpage to begin entering land information they want the BLM to consider for oil and gas leasing. If the nominator chooses to be anonymous, the BLM will not be able to contact that nominator for more information, or send status updates on their nominations. However, that nominator will receive the following information that he or she can use to check the status a specific EOI (EOI tracking number, submitted date, administrative state).

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.*

The Privacy Act Statement will be available via a linked web page, as well as a PDF file that can be downloaded and printed.

Privacy Notice: *Describe each applicable format.*

The Privacy Notice will be available on the NFLSS Public Portal “Acceptance of Terms” web page, which can be viewed as well as printed.

Notice will also be provided via a modal that is displayed at the beginning of the EOI submission process, and in the footer of each web page on the NFLSS Public Portal. When a member of the public initiates the process of submitting an Expression of Interest via the NFLSS Public Portal, a modal is displayed that contains the following text:

When submitting an Expression of Interest (EOI), you are not required to provide your name or address. If you provide contact information, the BLM will make this information available to the public. If you consider your name and address to be confidential, do not include it in your EOI.

If you choose to complete the nominator section of the EOI Submission form, we will save your contact information. If provided, we will use your contact information for the purpose of contacting you regarding nomination status, or to request follow-up information.

Contact information may be subject to disclosure, but will be handled in accordance with the requirements of the Privacy Act and the Freedom of Information Act to ensure the greatest protection of personal privacy.

If you have any questions or comments about the information presented here, please contact the FOIA and Privacy Officer of the Bureau of Land Management at (202) 912-7562.

Click **I Accept these Terms and Conditions** to continue to the next section of the online EOI form, or click **I Do Not Accept** to return to the NFLSS home page.

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.).**

The BLM staff will be able to search for EOIs submitted by a member of the public, and the Submitter's name can be a filter on lists of data in the system. However, the search feature does not allow the BLM staff to search on an individual's mailing address, home phone number, or cell phone number. PII other than name is specifically excluded from the allowable search parameters.

By design, the most common searches are not based on PII. The search parameters most frequently used to locate records in the system are EOI tracking number, parcel number, and land attributes, such as section, township, range, county, and land status. However, it will be possible for the BLM staff to view all nominations submitted by a specific individual, granted that this person entered his or her name in the Name field in the Nominator data entry screen on the EOI submission. If the nominator chooses to submit the EOI anonymously, search by Name will not discover this record. Only a search by other parameters, administrative state, submitted date, EOI tracking number parcel number, and other attributes about the land, will identify the record.

**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?**

The BLM staff will be able to update the nominator's contact information, if provided, in the NFLSS when the nominator provides new updated information to the BLM.

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

The system will include logic that performs basic validation on addresses that are entered by the submitter. Submissions may be anonymous, in which case, address validation is not performed. For members of the public who choose to provide their contact information, BLM proposes to use the Google Address API for address validation, approved by the security team.

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

When additional information is needed to process the nomination, communication will be attempted to the last address of record. When the additional information cannot be obtained due to the nominator



opting to not provide current contact information will result in the BLM staff to change the nomination to a “Closed” status in the system. Closing the status of a nomination in the NFLSS will not affect any other nominations in the NFLSS.

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

The retention period for EOIs submitted by the public is maintained under BLM, Item 4/24a and 4/24c.

Item 4/24a. Mineral Lease Sale History Case Files. Non-serialized case files are created for EOIs. These EOI files are retained in the Mineral Lease Sale History Case File once tracts are processed and made available for leasing. These records have a temporary disposition and cutoff at the end of the fiscal year in which the final determination of bid acceptance or rejection is made. Records are transferred to the Federal Records Center (FRC) 5 years after cutoff. FRC destroys 25 years after cutoff (N1-49-90-001, 4/24a).

Item 4/24c. Mineral Lease Sale Files - Nominations not Accepted. Nominations for parcels unavailable for leasing (i.e., closed to leasing, no minerals available, in an existing lease, etc.). Files will include copies of nomination and/or agency response. Responses may be in the form of telephone records or letters. In cases where a nomination includes both parcels accepted and parcels not accepted, file records in the Mineral Lease Sale History Case File and follow disposition (item 24a). These records have a temporary disposition and destroyed when records are 6 months old or when no longer needed for reference, whichever is longer (N1-49-99-001, 4/24c).

Expressions of Interest are temporary records. The electronically submitted EOIs maintained in the NFLSS will follow the same records retention schedule that is followed for the BLM’s paper records.

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

The procedures for the EOI files created from the submission of an EOI or nomination are documented in BLM Item 4/24a and 4/24c.

DOI records are destroyed by shredding or pulping for paper records, and degaussing or erasing for electronic records, in accordance with the National Archives and Records Administration (NARA) Guidelines and 384 Departmental Manual 1.

Temporary records are disposed of in accordance with the applicable records schedule and BLM policy. Destruction of eligible temporary records is documented on BLM Form 1270-4, Documentation of Records Destruction for On-Site and Federal Records Center (FRC) Disposals, and must be coordinated with the State/Center/WO Records Administrator or Records Manager and appropriate records



custodian. Permanent records that are no longer active or needed for agency use are transferred to the National Archives for permanent retention in accordance with NARA guidelines.

**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.**

There are risks to the privacy of individuals due to the PII provided by the nominator. However, the risks are addressed by using administrative, physical, and technical controls. The PII that is entered into the nominator data entry fields on the NFLSS Public Portal does not persist on the public site. Once the nominator selects the Submit action, the data is moved into the record that is saved to the internal NFLSS site, which is located behind the firewall.

The BLM published a notice in the *Federal Register*, *Updated Policy Regarding the Handling of Expressions of Interest*, 79 FR 842, January 7, 2014, to disclose to the public BLM’s policy that all expressions of interest received by the BLM will be published and be made publicly available. The BLM does not require a nominator to submit their contact information; however, inclusions of names and addresses will effectively operate as consent to release their information. The FISMA security categorization for the NFLSS is moderate.

Safeguards for NFLSS conform to the Office of Management and Budget (OMB) Circular A-130 and Departmental guidelines reflecting the implementation of the Computer Security Act of 1987 (40 U.S.C. 759).

NFLSS privacy safeguards are compliant with the privacy controls as listed in NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations.

NFLSS protects editing of the nominator’s contact information on the internal site through user identification, strong passwords, database permissions, and software controls. NFLSS and the hosting environment provide separation of duties and least privilege for those performing different roles.

- Separation of duties is enforced by assigned access to information system support functions. Some functions are mutually exclusive. Software is developed, tested, and released through a controlled process. Access to production system software is restricted to a limited number of BLM’s National Operation Center personnel, corresponding to job responsibilities.
- Least privilege within the application only allows authorized user access for the purpose of accomplishing specific application functions in accordance with organizational missions and business functions associated with their roles.
- Public users are restricted to publicly-accessible area of the application. They have no right to view or modify personal information protected by the Privacy Act, such as names and home addresses of private non-entrepreneurial individuals. Public users are not required to complete training prior to



submitting an EOI through the public portal. To assist users, the homepage will have a link to a tutorial, and each webpage have an on-line help about the page they are on.

## 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*

Nominators submitting a request to the BLM are attempting to make publicly available lands that are eligible for leasing to be placed on a competitive lease sale. The BLM staff may need to contact the individual who has submitted an EOI to request additional information such as supporting documentation needed to process their request, notify the individual when the nominated lands are unavailable for leasing, report status of their submission(s), and provide information on upcoming competitive lease sale for which the nominated lands will be included.

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?**

NFLSS 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.*
- 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*

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

The BLM staff will be granted access to the system if their job responsibilities include Onshore Oil & Gas Lease Sale support, including Geographic Information System or reporting functions related to on-shore leasing. Each user will be granted proper levels of access based on their job role, i.e., NFLSS employs role-based access founded on the principle of Least Privilege. Once authenticated, a BLM user can only perform functions for which the granted role is authorized. For instance, a Field Office, District Office, or State Office user can enter an EOI/nomination, bureau motion, or pre-sale offer into the system, but Washington Office users can only view the data and summary statistics (which contain no PII). PII is not included in Washington Office reports, and thus is only utilized in the initial review of the nomination or if correspondence regarding the status of the nomination is generated.

**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 contract contains the following privacy act clauses and provisions:



- 52.224-2 - Privacy Act
- 52.224-1 – Privacy Act Notification (Apr 1984)
- 1452.224-1 – Privacy Act Notification (Jul 1996)(Deviation)
- 52.239-1 - Privacy or Security Safeguards (Aug 1996) (5 U.S.C. 552a)

PWS Language - All Contractor employees who create, access or dispose of BLM data or information are required to complete web-based training courses on Records Management, the Freedom of Information Act, and the Privacy Act.

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?**

In accordance with system requirements, all changes to tracked entities are logged within the application. Logs include a time stamp and username. BLM GSS logs invalid logon attempts and these are recorded using Active Directory user name and timestamp.

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

Privacy Act Warning notices, audit logs, and least privileges have been employed to ensure that only authorized personnel can monitor use of the system.

Violations of the following Rules of Behavior are considered IT security incidents. According to the Department of Interior Manual 375 DM 19.11B, all suspected, actual, or threatened incidents involving the destruction, physical abuse or loss of technological resources shall be reported to the appropriate authorities. BLM employees shall report observed security incidents to their supervisors or the local Information Technology Security Manager (ITSM). The ITSM may recommend the removal of any individual User ID and password from and BLM computer system in the event of a security incident.



The Rules of Behavior are:

- No classified National Security information will be entered into any BLM computer system.
- BLM furnished computer hardware; software and data of the BLM are considered to be property of the United States Government. BLM computer systems shall be used for official business only. No games, personal software, private data, unlicensed proprietary software, or other non-government information will be used on or entered into any Government-owned computer system. Any use of computers, software or data for other than official business is expressly prohibited.
- Commercially developed and licensed software shall be treated as proprietary property of its developer. It is illegal to make or distribute copies of copyrighted material without authorization. The only exception is to make a backup copy of the software for archival purposes. Unauthorized duplication of software is a Federal crime.
- Individual User IDs and passwords are assigned to each person having a valid requirement to access any BLM systems. All activity accomplished under this User ID is directly attributable to the assigned user.
- Do not attempt to access any data contained on BLM computer systems for which you do not have authority to access. If the need to access a computer system has been established through the appropriate supervisory channel, the request to grant access shall be made to the appropriate system administrator.
- User ID and passwords are not to be disclosed or shared with anyone, including BLM system administrators. If you believe your User ID and password have been compromised, immediately change your password and notify the local ITSM. Passwords should be changed at required intervals or any time you feel the possibility exists that it may have been compromised.
- Never use personal information (e.g., telephone numbers, names of family members, pets, etc.) for our passwords. Password policy requires all passwords to be created in accordance with BLM IM- 2002-064, Policy on the Use of Strong Passwords.
- User IDs and passwords should not be written down, except on the original assignment document or email. This document should then be destroyed (or email deleted) or be kept in a locked safe or cabinet.
- When not actively working on the computer system remember to log off the system. You are responsible for all activity logged under your User ID.

**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*

(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*

(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 NFLSS System Manager is responsible for protecting the privacy rights of the public and employees affected by the interface.

The Director, Office of Emergency Management, is the NFLSS Information System Owner and the official responsible for oversight and management of the NFLSS security controls and the protection of agency information processed and stored in the NFLSS application. The Information System Owner and NFLSS Privacy Act System Manager, in collaboration with the DOI Senior Management Team, are responsible for ensuring adequate safeguards are implemented to protect individual privacy in compliance with Federal laws and policies for the data managed, used, and stored in the NFLSS



application. These officials, DOI bureau and office emergency response officials, and authorized NFLSS personnel are responsible for protecting individual privacy for the information collected, maintained, and used in the system, and for meeting the requirements of the Privacy Act, including providing adequate notice, making decisions on Privacy Act requests for notification, access, and amendments, as well as processing complaints, in consultation with Bureau and Office Privacy Officers.

**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?**

Each individual accessing the various NFLSS data is responsible for how he/she uses the data. The NFLSS Internet website contains a link to the Department of the Interior's "Disclaimer Statement" regarding the accuracy and use of the data.

The NFLSS Information System Owner is responsible for oversight and management of the NFLSS security and privacy controls, and for ensuring to the greatest possible extent that agency data is properly managed and that all access to agency data has been granted in a secure and auditable manner. The Information System Owner is also responsible for ensuring that any loss, compromise, unauthorized access or disclosure of agency PII is reported to US-CERT within one hour of discovery in accordance with Federal policy and established procedures.

Customer communications are managed through an initial point of contact service model. NFLSS Customer Support Managers (CSMs) serve as the initial point of contact for assuring the proper use of client data, as well as informing clients of the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information. The NFLSS Customer Support management team will also be involved in this process as necessary.