



# 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:** Probate Case Management and Tracking System (ProTrac) Decommissioning  
**Bureau/Office:** Bureau of Indian Affairs (BIA), Division of Probate and Estate Services (DPES)  
**Date:** October 14, 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 Probate Case Management and Tracking System (ProTrac) in Alaska was a customized, commercial off-the-shelf major application designed to support all Indian Trust Probate management activities. ProTrac supported the Division of Probate and Estate Services (DPES), Office of Hearing and Appeals (OHA), and the Bureau of Trust Funds Administration (BTFA) in accomplishing their mission of effectively managing probate cases for American Indians.



The primary purposes of the system were: (1) To provide a central repository for records related to a given probate estate that can be forwarded to OHA for adjudication and to monitor the progress of an estate through the probate process; (2) Allowed Bureau of Indian Affairs (BIA) employees to collect and gather information regarding potential heirs, legatees, devisees, and creditors of an estate; (3) Obtained the status on any estate, and measure progress, correctness, and timeliness of work done on probate cases during case preparation, adjudication, distribution, and closure; (4) Allowed BTFA employees to document the status of decedent Individual Indian Money (IIM) accounts; and (5) Provided OHA with a source of information regarding the estate.

The Probate (ProTrac) system has been replaced by the Trust Asset and Accounting Management System (TAAMS) Probate module. Please see the TAAMS PIA on the DOI PIA website at <https://www.doi.gov/pia>. Decommissioning activities related to the ProTrac boundary and its constituent subsystem-level components have been conducted in accordance with National Institute of Standards and Technology (NIST) Special Publication (SP) 800-37, *Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*, and current Department of the Interior (DOI) policies and standards. The information security life cycle artifacts have been created and are managed using the DOI Cyber Security Assessment and Management (CSAM) tool.

Decommissioning activities were approved by the BIA Director on May 26, 2022.

Probate (ProTrac) users removed, and user accounts disabled July 22, 2022.

Probate (ProTrac) CSAM boundary was retired August 2, 2022.

Hardware/Software: Probate (ProTrac) test, development, and production environments will be disposed of using the Indian Affairs (IA) System Disposal Change Management Process and in compliance with NIST SP 800-88, Guidelines for Media Sanitization. Asset disposal was completed September 30, 2022.

Data: Prior to the decommissioning of Probate (ProTrac), the Office of Trust Services (OTS) successfully migrated Probate (ProTrac) data into TAAMS on January 24, 2022. A read-only copy of the data and image files was backed-up on an encrypted, FIPS 140-2 compliant hard drive on September 8, 2022, which is maintained by the Office of Information Management Technology (OIMT).

Documentation: System manuals and data dictionary were transferred September 8, 2022, to an encrypted, FIPS 140-2 compliant hard drive maintained by OIMT.

DOI developed a decommissioning plan to ensure privacy, security and records requirements were met. There is a limited privacy risk for the decommissioning of the Probate (ProTrac) system infrastructure related to potential unauthorized access or mishandling of the residual data that remains in the Probate (ProTrac) system before it can be destroyed. IA implemented physical, technical, administrative, and logical controls to protect the data until final disposal and included details on the disposal of the information technology resources.

All Storage devices were exsessed in accordance with DOI policy. A file image of the virtual machine is stored in a secure, system administrator access only repository managed by OIMT and will be destroyed at the expiration of the records retention period.



Records were transferred to TAAMS will be as retained under the appropriate National Archives and Records Administration (NARA) approved Indian Affairs Records Schedules (IARS). Paper records are covered by IARS Record File Code TR-4631-P5, Probate File and have been scheduled as permanent records by NARA Job No. N1-075-04-0004, approved on November 21, 2003. Records are maintained in the office of record for a maximum of 5 years. Records are cutoff at the end of the fiscal year in which the estate is settled. The records are then retired for permanent safekeeping to the American Indian Records Repository which is a Federal Records Center. Subsequent legal transfer of records to the National Archives of the United States will be as jointly agreed to between DOI and NARA.

Information Technology records are maintained under the Departmental Records Schedule (DRS) 1.4A Short Term Information Technology Files, System Maintenance and Use Records (DAA-0048-2013-0001-0013), and System Planning, Design, and Documentation (DAA-0048-2013-0001-0014). These records include IT files that are necessary for day-to-day operations but no longer-term justification of the office's activities. The disposition of these records is temporary. Records covered under DAA-0048-2013-0001-0013 have a temporary disposition and will be cut off when superseded or obsolete and destroyed no later than three years after cutoff. Records covered under DAA-0048-2013-0001-0014 have a temporary disposition and will be cut off when superseded by a newer version of upon termination of the system and destroyed three years after cut-off. Only authorized IA personnel have access to the equipment and residual data pending final disposition.

The disposition of data follows NARA guidelines and approved Records Schedule for transfer, pre-accession, and accession activities to NARA. These activities comply with 36 CFR 1220-1249, specifically 1224 - Records Disposition Programs and Part 1236 - Electronic Records Management, NARA Bulletins and the BTFA, Office of Trust Records, which provides records management support to include records management policies and procedures, and development of BIA's records retention schedule. System administrators dispose of DOI records by shredding or pulping for paper records and degaussing or erasing for electronic records in accordance with NARA Guidelines and Departmental policy.

**A. NARA Guidelines and Departmental policy What is the legal authority?**

5 U.S.C. 301, 551 et seq.; 25 U.S.C. 2, 9, 372, 373, 373a, 373b, 374, and 2201 et seq.; 25 CFR Part 15; 25 CFR 15.105(b); 43 CFR Part 4

**B. 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*

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



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

UII Code: 010-000000072, Probate (ProTrac), System Security and Privacy Plan

No

**D. 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<br><i>If Yes, provide a description.</i> |
|----------------|---------|-----------------------|---|
| N/A            | N/A     | N/A                   | N/A   |

**E. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?**

Yes: *List Privacy Act SORN Identifier(s)*

Records in Probate (ProTrac) are maintained under DOI system of records notice INTERIOR/BIA-27, Bureau of Indian Affairs Probate Files, 72 FR 8767 (February 27, 2007), modification published at 86 FR 50156 (September 7, 2021) which may be viewed at <https://www.doi.gov/privacy/sorn>.

Records from Probate (ProTrac) shared with or transferred to the OHA are maintained under DOI system of records notice INTERIOR/OS-09, Hearings and Appeals Files, 80 FR 26292 (May 7, 2015), modification published at 86 FR 50157 (September 7, 2021) which may be viewed at <https://www.doi.gov/privacy/sorn>.

No

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

Yes: *Describe*

OMB Control Number 1076-0169 information collection covers information collected under 25 CFR Part 15. OMB Control No. 1076-0169, Probate of Indian Estates, except for Members of the Osage Nation and the Five Civilized Tribes, Expires December 31, 2024.

No