



## 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: Wild Horse and Burro Online Corral (OLC)**

**Bureau/Office: Bureau of Land Management**

**Date:** May 7, 2019

**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 OLC allows potential adopters or purchasers of BLM wild horses and burros nationwide to view available animals, find out about upcoming adoption events, submit adoption and purchase applications, and bid online. This portion of the OLC is open to the public.



The system also contains an administrative section for use by the BLM and its contractors, exclusively. This section allows the BLM staff to complete such tasks as adding/modifying animal information and reviewing adoption applications and bids received and finalizing bills of sale and private maintenance and care agreements. This administrative section is not open to the public; in fact, access is limited to only the pertinent BLM Wild Horse and Burro as well as IT staff.

Approved adoption and purchase application information is transferred via application programming interface to the Wild Horse and Burro Program System which is a system used by internal BLM Wild Horse and Burro program users.

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

Public Law 92-195, The Wild Free-Roaming Horses and Burros Act of 1971.  
43 CFR 4700  
16 U.S.C. 1333 and 31 U.S.C. 7701.

**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* OLC is currently in CSAM as a system in development. It will be assigned a UII code when finalized. The System Security Plan (SSP) for Wild Horse & Burro Online Corral covers this system.

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	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)* BLM-37, Wild Horse & Burro Program System, 72 FR 67956, 3 Dec 2007, and BLM-28, Adopt-A-Horse, 51 FR 25111, 10 July 1986. Both SORNs may be viewed at [https://www.doi.gov/privacy/blm\\_notices](https://www.doi.gov/privacy/blm_notices). BLM-37 is currently being revised to provide updated content for the system and incorporate new Federal government-wide requirements in accordance with OMB Circular A-108. The records form BLM-28 will be incorporated into BLM-37 during this revision to create a SORN that covers the program area and BLM-28 will be rescinded.

No

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

Yes: *Describe* The BLM Application for Adoption of Wild Horse(s) or Burro(s) obtained OMB approval, OMB Control Number is 1004-0042, title "Protection, Management, and Control of Wild Horses and Burros (43 CFR part 4700)." Expiration Date is February 29, 2020.

No

## Section 2. Summary of System Data

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

Name

Social Security Number (SSN)

Personal Cell Telephone Number

Birth Date

Personal Email Address

Home Telephone Number

Mailing/Home Address

Driver's License

Other: *Specify the PII collected.* Address of the Facility where the horses are being kept. Payments may be collected for animal purchases. Any payments are processed through the Department of the Treasury, Bureau of Fiscal Service, utilizing the Pay.gov website. Individuals logging on to Online Corral are redirected to the Pay.gov website to make payment. Payment data provided by users through Pay.gov is presumed to be current and accurate, and data verification processes are managed by the Department of the Treasury. Information received from Pay.gov consists of accounting and financial data which is forwarded to the DOI Financial and Business Management System (FBMS) for payment processing. Only a confirmation receipt of payment is returned from Pay.gov to the system, which includes information such as merchant confirmation number.



User location, device, and browser information may be collected on individuals by search engines such as Google. The BLM does not request this information and the use of such is covered by Google and can be viewed at [https://support.google.com/analytics/answer/2700409?hl=en&utm\\_id=ad](https://support.google.com/analytics/answer/2700409?hl=en&utm_id=ad).

**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* Program officials may verify applicants' information or conduct background checks on applicants.

**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 primary uses of the information are to:

1. Identify and verify information from individuals who have applied to obtain custody of a wild horse or burro through adoption or sale;
2. Document the rejection, suspension or granting of the request for adoption or sale;
3. Monitor compliance with laws / regulations concerning maintenance of adopted animals;
4. Identify contractors / employees / volunteers/ service providers required to perform program functions;
5. In accordance with a court order; or instances where information indicating a violation or potential violation of a statute, regulation, rule, order, or license must be made to appropriate Federal, State, or local agencies for enforcement;
6. Identify and assign level of access required by BLM Wild Horse and Burro program personnel; and
7. Authorize the disclosure of records to individuals involved in responding to a breach of Federal data.



**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 throughout the BLM with personnel who are involved in the Wild Horse and Burro program, the Washington Office personnel who perform oversight of Wild Horse and Burro Program, BLM Law Enforcement, and with developers and database administrators who assist in maintaining the OLC. Additionally, information is shared with Freedom of Information Act (FOIA) officers as required in response to FOIA requests. The Online Corral database contains elements that require review under the Privacy Act (PA) disclosure requirements at 5 U.S.C. 552a (b) and the FOIA, 5 U.S.C. 552, before any information will be released. Rules of Behavior documentation is in accordance with BLM policy and is available from the specific project files. Applicable Privacy Act warning statements are placed on all information printouts from the OLC.

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

Office of the Inspector General and other authorized auditors. Information may also be shared with other Bureaus and offices as authorized and described in the routine uses contained in the BLM-37, Wild Horse & Burro Program System (WHBPS) and BLM-28, Adopt-A-Horse system of records notices.

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

Information may also be shared with the General Accounting Office and other Federal Agencies as authorized and described in the routine uses contained in the BLM-37, Wild Horse & Burro Program System (WHBPS) and BLM-28, Adopt-A-Horse system of records notices.

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

Information may also be shared with Tribal, State or Local Agencies, such as Law Enforcement Agencies, as authorized and described in the routine uses contained in the BLM-37, Wild Horse & Burro Program System (WHBPS) and BLM-28, Adopt-A-Horse system of records notices.

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

Information may also be shared with contractors who provide program support.

- 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.*

Submission of the requested information on the Application for Adoption of Wild Horses or Burros, Application to Purchase Wild Horses and Burros, the Private Maintenance and Care Agreement for Wild Horses or Burros and the Bill of Sale for Wild Horses and Burros are necessary to obtain or retain a benefit. Individuals can decline to provide the information, however, failure to submit all of the requested information or to complete one of these forms may result in the rejection and/or denial of the application.

- 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.*

A Privacy Notice is located on the Wild Horse and Burro Adoption website. Notice is also provided through the publication of this privacy impact assessment and the BLM-37, Wild Horse & Burro Program System (WHBPS) system of records notice, which may be viewed at [https://www.doi.gov/privacy/blm\\_notices](https://www.doi.gov/privacy/blm_notices). BLM-28, Adopt-A-Horse system of records notice, which may be viewed at [https://www.doi.gov/privacy/blm\\_notices](https://www.doi.gov/privacy/blm_notices).

- 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.).**

Personal information is retrievable by (1) name; (2) driver's license; (3) SSN; (4) Address; (5) Role/Certification; (6) animal freemark number. These are the minimum identifiers by which the Wild Horse and Burro program can uniquely distinguish specific adopters and personnel, especially where records are stored about several members of the same family.



**I. Will reports be produced on individuals?**

**Yes:** *What will be the use of these reports? Who will have access to them?*

Reports that include information on individuals are based on animals maintained at a private care facility; numbers of animals titled to an individual; and compliance records. Access to reports containing identifiable personal information is limited to those with a “need to know” to complete program management responsibilities.

No

**Section 3. Attributes of System Data**

**A. How will data collected from sources other than DOI records be verified for accuracy?**

Information is obtained directly from individual applicants during the application process. Addresses submitted by individuals on the Application for Adoption of Wild Horses or Burros, Application to Purchase Wild Horses and Burros, the Private Maintenance and Care Agreement for Wild Horses or Burros and the Bill of Sale for Wild Horses and Burros are verified using Commercial off the shelf (COTS) software that determines if an address is complete, valid, and deliverable by the U.S. Postal Service.

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

The Online Corral includes automated edit checks for completeness and valid domain values. Automated business processes include checks for information completeness at each step of every transaction, as, for example, when filling out a multi-page electronic application on the Web, and roll back incomplete transactions. Address information is checked using COTS software that determines if an address is complete, valid, and deliverable by the U.S. Postal Service.

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

The Online Corral data model is set up so that data is updated in a table and is then linked to the corresponding data elements. The data model ensures that the same data does not need to in multiple fields.

Data is collected real time via point of access to the application, i.e. desktop, tablet, phone, etc. via a web browser. Data accuracy and integrity are ensured via standard physical and logical data model development practices outlined in the BLM data standards. Data model development techniques ensure the data that is collected is useful to the business and is named in such a way that it is clear what each data element represents.



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

Information collected in the Online Corral is then transmitted securely and electronically via an application programming interface within the BLM firewall to WHBPS. DOI bureaus and offices follow guidance on permanent and temporary records disposition issued by the National Archives Records Administration (NARA). The BLM Records Retention schedule is BLM 4/8 and BLM 20/25. Records for WHBPS are permanent, with a cutoff every 5 years for transmission to NARA.

Transfer a copy of the master file to NARA upon approval of this schedule, along with the technical documentation, in accordance with 36 CFR 1235.44-50. Thereafter, transfer a copy every 5 years, along with the current technical documentation. (N1-049-09-4, 1a).

**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 Online Corral files are documented in BLM 4/8 and BLM 20/25. This system contains no temporary records.

**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 is a moderate privacy risk due to the type and volume of personal information maintained in the OLC. Users submit adoption and purchase applications for animals in the OLC which a Wild Horse and Burro Program designated user reviews. Information collected and used is limited to the minimum required to perform the purpose and functions of the OLC. To mitigate privacy risk, BLM has truncated the Social Security numbers in the OLC, and has restricted access to personally identifiable information within the OLC to a limited number of users.

There is a risk that individuals may gain unauthorized access to the information in the system. System security controls are in place to prevent access by unauthorized individuals to sensitive information. The Wild Horse and Burro Online Corral (OLC) is classified as moderate for FISMA and has all of the required security documentation and a current Authority to Operate (ATO). In accordance with OMB Circulars A-123 and A-130, OLC has controls in place to prevent the misuse of the data by those having access to the data. Such security measures and controls consist of: passwords, user identification, IP addresses, database permissions and software controls. All employees including contractors must meet the requirements for protecting Privacy Act information.



Business rules and guidelines, as well as rules of behavior, have been established to prevent inadvertent disclosure to individuals not authorized to use the OLC or those who do not have a direct “need to know” certain information contained in the OLC. All end-users have an individual password and ID that is issued by the OLC application steward. All new users will receive a user guide detailing the appropriate use of the OLC. All DOI employees must complete mandatory privacy, security and records management training annually, and acknowledge the DOI Rules of Behavior.

There is a risk that authorized users will conduct unauthorized activities such as using, extracting and sharing information with unauthorized recipients. This risk is mitigated by limiting access to the system to only those personnel who have an official need to perform their job duties. Access to information is role-based and is only granted on a need-to-know basis, and requires DOI credentials. Accounts are reviewed annually to ensure that only authorized personnel have OLC logins. Additionally, any account that is inactive for more than one year is automatically suspended. All personnel accessing the OLC must acknowledge the rules of behavior prior to each login. The System Security Plan describes the practice of audit trails. Audit trails maintain a record of activity and user activity including invalid logon attempts and access to data via User ID, IP Address, etc. Audit trails are also captured within the OLC to determine who has added, deleted or changed the data within the OLC. Any qualification overrides require that the account manager document the reasoning and the login name with date and time is added by the OLC.

There is a risk that an application may be denied based on the submission of inaccurate information. All information is obtained directly from the applicant so is presumed to be complete and accurate. Any inaccurate information provided by the applicant may be corrected during user validation procedures or by the applicant themselves. The website uses https secure data transmissions.

There is a risk that individuals providing information do not have adequate notice on how their PII will be collected or used. This risk is mitigated by the publication of this PIA and the BLM Wild Horse and Burro Program System notice, and the Privacy Act statements provided on the applications and the official BLM website.

## 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 use of data is automated to serve specific business process needs. Those needs are to track potential adopters or purchasers to ensure that only eligible adopters and buyers are approved animals and that adopters and buyers do not exceed the maximum number of animals they are approved to adopt or purchase. Tracking this information also gives the Wild Horse and Burro program the ability to prevent applicants from adopting or purchasing an animal if there has been a compliance issue on an earlier adoption or sale.

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.*

The Online Corral does not derive new data. The OLC provides the capability to aggregate information about an adopter to determine how many animals the adopter has obtained, since there are legal limitations on that number.

Reports are compiled but not stored in the OLC and hard copies are managed per existing BLM guidance for protecting basic personal information records, to protect them from unauthorized access or disclosure. Access to reports is controlled as documented in the National Applications System Security Plan. Other aggregations are produced for program progress reporting, but do not identify individuals. Where no Privacy Act issue is concerned, reports ordinarily are releasable to the public.

- 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?**

Not applicable



**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.*

The OLC operates under a formal system security plan, and is subject to security certification and accreditation requirements. The current design segregates functions that may involve Privacy Act information so that role-based security restrictions can be implemented more confidently.

- 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?**

Roles and associated access privileges are established as part of the System Security Plan. Access is controlled by assignment of roles and is limited to necessary access. Individual access to the OLC and authorizations within the OLC require signed documentation from the program prior to creation or modification. Access is controlled by assignment of roles and specific discrete authorizations and is limited to necessary access. Therefore, individuals have limited access to the data.

**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 Privacy Act clauses are included in the Information Technology Support Services contract, which is the contract supporting the OLC.

- 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

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

Not applicable

**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 Online Corral System Manager is responsible for protecting the privacy rights of the public and employees affected by the interface.

The Assistant Director for Renewable Resources and Planning (WO-200), is the Online Corral Information System Owner and the official responsible for oversight and management of the Online Corral security controls and the protection of agency information processed and stored in the Online Corral application. The Information System Owner and Online Corral 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 Online Corral application. These officials, DOI bureau and office emergency response officials, and authorized Online Corral personnel are responsible for protecting individual privacy for the information collected, maintained, and used in the OLC, 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 the BLM 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 Wild Horse and Burro Online Corral System Owner is responsible for oversight and management of the Online Corral 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 DOI-CIRC within one hour of discovery in accordance with Federal policy and established DOI procedures.