

# Privacy Impact Assessment Update for the

# **Canine Website System**

# DHS/TSA/PIA-036(a)

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# Abstract

The Canine Website System (CWS) is a web-based system administered by the Transportation Security Administration (TSA) National Explosives Detection Canine Team Program (NEDCTP) to coordinate operations. CWS is a privacy sensitive system because it collects personally identifiable information (PII) from program participants to facilitate training, foster communication, and to perform administrative functions. In accordance with the Section 208 of the E-Government Act of 2002, TSA is updating CWS's Privacy Impact Assessment (PIA) from January 2012 to reflect that it also collects PII from members of the public interested in adopting NEDCTP canines.

## Introduction

Under the Aviation and Transportation Security Act (ATSA), the Transportation Security Administration (TSA) is responsible for security in all modes of transportation.<sup>1</sup> The National Explosives Detection Canine Team Program (NEDCTP) is a partnership between TSA, airports, and local law enforcement agencies and supports TSA's mission by preparing the NEDCTP canine teams (handlers plus canines) to carry out transportation security initiatives. The Federal Government trains canine handlers to perform transportation security operations. Canine handlers are employees of the Federal Government, or state, city, county, or airport law enforcement authority designated to provide airport security. Canines are procured by the Department of Defense (DoD) Military Working Dog (MWD) Program and trained for explosives detection by the TSA Canine Training Center (CTC). The CTC administers the Canine Adoption Program for canines that are unable to successfully complete the training, or retire from explosives detection service. Members of the public interested in adopting an eligible canine may apply by submitting TSA Form 433, *Canine Adoption Application*, providing relevant household information, personal references, and a veterinarian's contact information.

## **Reason for the PIA Update**

This PIA update reflects that TSA administers a canine adoption program that collects PII from members of the public interested in adopting a canine and that records of successful adoption are maintained securely in hard copy form at the CTC. The adoption records, including the approved application form, corresponding interviews and reference responses, contain PII on members of the public, their personal references, and veterinarian contact information.

<sup>&</sup>lt;sup>1</sup> Pub. L. 107-71 (Nov. 19, 2001); 49 U.S.C. § 114 (f).



# **Privacy Impact Analysis**

#### The System and the Information Collected and Stored within the System

Along with the information collected from canine handlers listed in the original PIA, the NEDCTP collects PII from members of the public applying to adopt an eligible canine from the CTC. The data elements collected include:

- Applicant's name;
- Applicant's home address;
- Applicant's phone number;
- Applicant's email address;
- Applicant's occupation;
- A Google Earth image or personal photograph of the applicant's yard;
- Ages of all children in the applicant's household;
- Name, email address, and phone number of two personal references; and
- The applicant's veterinarian's name, office address, email address, and phone number.

Most applicants email the applications to the CTC; thus, the applications are maintained in the Canine Adoption Program's email program. Only applications that result in adoption are stored securely in hard copy form at the CTC.

#### Uses of the System and the Information

The uses of the system or of the information have not changed with this update: to carry out NEDCTP administrative functions.

#### Retention

Adoption applications are maintained for 15 years after the date of adoption in accordance TSA CWS Records Schedule 3500.12/NARA General Records Schedule (GRS) 4.1 and 4.3. Rejected or inactive applications are stored for three years after denial or withdrawal in accordance with TSA Non-Screener Training Records Schedule 1900.4/NARA GRS 2.6 Item 010.

#### **Internal Sharing and Disclosure**

Internal sharing and disclosure have not changed with this update.



#### **External Sharing and Disclosure**

The adopter's name, address, and phone number are shared with the DoD MWD Program for updating DoD property records and the canine's medical record in accordance with applicable DoD-TSA interagency agreements and pursuant to DoD's authority to support civilian law enforcement agencies with equipment and equipment maintenance under 10 U.S.C. §§ 372(a) and 374(a). The privacy risk for sharing this information is minimal.

#### Notice

A Privacy Notice is provided to individuals on the application form. The Privacy Notice can been found in Appendix A of this PIA. There is a small risk that personal references may not be aware that their contact information is provided on the form by the applicant. TSA partially mitigates this risk by advising applicants to obtain their references' permission.

#### Individual Access, Redress, and Correction

Access, redress, and correction methods have changed to include those located in DHS/TSA-006 System of Records Notice, Correspondence and Matters Tracking Records,<sup>2</sup> as mentioned on the form's Privacy Notice. TSA does not collect immigration status on this form and therefore treats all requests the same. There are minimal privacy risks associated with this change.

#### **Technical Access and Security**

Technical access and security have not changed with this update.

#### Technology

The technology has not changed with this update.

### **Responsible Official**

Gary Bills CWS Administrator Transportation Security Administration Department of Homeland Security

### **Approval Signature**

Original, signed copy on file with the DHS Privacy Office.

Jonathan R. Cantor Acting Chief Privacy Officer Department of Homeland Security

<sup>&</sup>lt;sup>2</sup> See DHS/TSA-006 Correspondence and Matters Tracking Records, 75 FR 18863 (April 13, 2010).



#### APPENDIX A

**AUTHORITY:** 49 USC § 114(f)(15); 40 USC § 555; 41 CFR § 102-36.30; 41 CFR § 102-36.35(d); and 41 CFR § 102-36.365.

**PRINCIPAL PURPOSE(S):** This information will be used to manage the canine adoption process at the TSA Canine Training Center.

**ROUTINE USE(S):** This information may be shared with the Department of Defense (DoD) Military Working Dog program in accordance with 10 USC § 372(a) and 374(a), and under the Privacy Act including routine uses identified in the TSA system of records, DHS/TSA-006 Correspondence and Matters Tracking Records.

**DISCLOSURE:** Furnishing this information is voluntary; however, failure to provide the requested information may prevent TSA from approving the application.