



**Privacy Impact Assessment Update  
for the  
Accessibility Compliance  
Management System (ACMS)**

**DHS/ALL/PIA-025(a)**

**March 28, 2017**

**Contact Point**

**Allen Hoffman**

**Deputy Executive Director**

**Office of Accessible Systems & Technology (OAST)**

**Office of the Chief Information Officer**

**Department of Homeland Security**

**(202) 447-0503**

**Reviewing Official**

**Jonathan R. Cantor**

**Acting Chief Privacy Officer**

**Department of Homeland Security**

**(202) 343-1717**



## Abstract

The Department of Homeland Security (DHS) Office of Accessible Systems & Technology (OAST) operates the web-based Accessibility Compliance Management System (ACMS). ACMS is used to bring together a DHS-wide single point of entry and reporting system to track all related activities under Sections 501, 503, 504, and 508 of the Rehabilitation Act of 1973, as amended,<sup>1</sup> to support DHS employees and members of the public with disabilities. ACMS allows all DHS components to document and report compliance and accessibility activities and to consistently track status and progress towards meeting the Section 508 compliance requirements and Equal Employment Opportunity (EEO) program requirements. ACMS collects, uses, maintains, and disseminates sensitive personally identifiable information (SPII) of individuals seeking reasonable accommodations.<sup>2</sup> This Privacy Impact Assessment (PIA) Update is being conducted to describe and assess OAST's intent to upload medical documentation that substantiates an individual's request for accommodations.

## Introduction

OAST provides DHS leadership, vision, and direction for ensuring that electronic and information technology (EIT) procured, developed, maintained, or used by DHS is accessible to individuals with disabilities as mandated by Section 508 of the Rehabilitation Act of 1973, as amended.

To meet this responsibility, OAST provides governance and oversight of Component Accessible Systems and Technology Programs (ASTP), and other related activities throughout the lifecycles of EIT projects across the Department. Component ASTPs rely upon Section 508 coordinators to ensure Section 508 compliance is achieved in the various projects underway in that environment. In addition, OAST provides assistance to EEO offices across the Department in providing reasonable accommodations. ACMS provides a centralized system to bring all the various pieces of information together to allow Component ASTPs and OAST to manage and track the status of requests and progress towards meeting Section 508 compliance requirements.

ACMS is a centralized ticket<sup>3</sup> management and data tracking system<sup>3</sup> that allows DHS Component Section 508 offices, EEO offices, and OAST to manage all accessibility-related

---

<sup>1</sup> The Rehabilitation Act of 1973, as amended, is the federal legislation that authorizes the formula grant programs of vocational rehabilitation, supported employment, independent living, and client assistance. The Act also includes several sections (501, 503, 504, and 508) concerning rights, advocacy, access, and protections for individuals with disabilities. Specifically, the Act prohibits discrimination based on disability in programs conducted and funded by the Federal Government (504). It covers discrimination in federal employment, and in the employment practices of federal contractors (501 & 503). In addition, it requires federal electronic and information technology to be accessible to people with disabilities, including employees and members of the public (508).

<sup>2</sup> A reasonable accommodation is an adjustment or alteration in an employee's work environment that enables an individual with a disability an equal opportunity to perform his or her job or enjoy benefits and privileges of employment.

<sup>3</sup> A ticket is a record or an electronic case file in ACMS that contains all information related to a requestor's request.



activities. ACMS contains multiple databases<sup>4</sup> in which tickets are categorized. Analysts<sup>5</sup> can access, update, and close all associated tickets related to their job roles and generate reports on their tickets.

To submit a reasonable accommodation request, a requestor<sup>6</sup> can provide the required information in two ways: 1) through the “Request Assistance” form on the ACMS home screen<sup>7</sup> which then automatically generates a ticket in ACMS, or 2) through phone or email directly to an ACMS analyst (or the Accessibility Help Desk), who will create a ticket in ACMS with that requestor’s information. ACMS only collects the required information necessary to service the individual request and provide contact back to the requestor. Requestors do not have access to edit their own information directly in ACMS after submission. An ACMS analyst(s) is then assigned to the ticket. ACMS analysts are also responsible for uploading information updates received from requestors as a request is processed.

ACMS analysts then process the ticket. ACMS analysts continue to update the ticket data fields following their respective DHS component’s EEO guidelines and policies until a resolution is reached. Once a ticket has reached a resolution, the ACMS analyst would close the ticket.

The current Reasonable Accommodation database is restricted in ACMS and can only be accessed by the analysts assigned to a specific accommodation ticket, the Component Accommodation Administrator, or OAST administrators. ACMS uses role-based permission accounts and single sign-on to ensure security requirements are met.

## Reason for the PIA Update

OAST submits this PIA Update to report ACMS’s new collection: storing medical documentation (e.g., a doctor’s note, prescription, medical history) pertaining to an individual’s<sup>8</sup> disability that is used to process reasonable accommodation requests. When an individual submits a reasonable accommodation request from an agency within the Department, he or she may provide supporting medical documentation. OAST plans to store this information electronically with the rest of the individual’s reasonable accommodation request data.

---

<sup>4</sup> These databases are listed in the original ACMS PIA. Please *see* DHS/ALL/PIA-025 Accessibility Compliance Management System (ACMS) (June 22, 2010), available at <https://www.dhs.gov/publication/dhsallpia-025-accessibility-compliance-management-system-acms>.

<sup>5</sup> An analyst or user is an ACMS analyst that uses ACMS to manage requests on behalf of requestors. Users can include those from the component disability program office who process the requests, the Component Accommodation Administrator, OAST administrators, etc.

<sup>6</sup> A requestor is an individual that is requesting services or assistances. Requestors have the ability to submit requests to ACMS; however, they do not have access to ACMS. Requestors can be DHS employees and contractors or members of the public.

<sup>7</sup> For more information about ACMS and to access the “Request Assistance” form, please *see* <http://accessibility.dhs.gov/>.

<sup>8</sup> Medical documentation will typically only be collected from DHS employees and contractors. However, it is possible that members of the public will need to submit their medical documentation to ACMS as well. An example would be when a new job applicant needs an interpreter for a job interview.



Medical documentation, including handwritten notes, will be submitted as an electronic attachment to the “Request Assistance” form by the requestor or via email directly to an ACMS analyst (or the Accessibility Help Desk). These documents will be uploaded into ACMS and will be stored in a requestor’s ticket. ACMS analysts only attach relevant medical documentation to each reasonable accommodation request; they do not amend previous documentation if a new reasonable accommodation request is submitted. Each ticket may contain medical documentation that supports a specifically requested reasonable accommodation. Medical documentation is an optional field for a reasonable accommodation ticket.

Medical documentation has previously been collected to process reasonable accommodation requests; however, it was not stored in ACMS and was segmented from the ACMS ticket information. The previous process segmented the ticket within ACMS from the hard copy of medical documentation, which was stored in a secure physical location. This inhibited the ability of processing requests by not storing complete records of reasonable accommodations in one easily accessible location. Although OAST now collects medical documentation in ACMS, OAST does not store any hard copy documents. They are still stored by the Disability Program Managers<sup>9</sup> (DPM).

Storing the medical documentation in ACMS will benefit the Department and requestor in several ways. It will reduce determination delays for reasonable accommodation requests. This new procedure will facilitate file sharing between all analysts working on the request, and create one single reasonable accommodation file that can be archived, accessed, and disseminated as needed. This will benefit both DHS and the requestor when gathering data to decide approval or denial for all reasonable accommodation requests. Also, if a requestor filed a complaint against the agency, the analyst would provide all relevant records related to a reasonable accommodation to the requesting legal team. Having a single data source, like ACMS, will eliminate the need to track down records stored in multiple locations. It will reduce further risk of the Department being unable to find all associated hard copies of data and other integral case information.

## Privacy Impact Analysis

In each of the below sections consider how the system has changed and what impact it has on the below fair information principles. In some cases, there may be no changes and indicate as such.

### Information Collected and Stored within the System

This PIA Update is being conducted to assess the addition of medical documentation pertaining to a person’s disability into ACMS. This information will be used to assist in processing reasonable accommodation requests. The following requestor information is already currently stored in ACMS:<sup>10</sup>

---

<sup>9</sup> A Disability Program Manager is a person/office responsible for the reasonable accommodation process within each DHS component/entity.

<sup>10</sup> ACMS collects additional PII from ACMS analysts/users to grant access to the system. For more information about this aspect of ACMS, please *see* DHS/ALL/PIA-025 Accessibility Compliance Management System (June 22, 2010), available at <https://www.dhs.gov/publication/dhsallpia-025-accessibility-compliance-management-system>



- E-mail
- Name (first name, middle initial, last name, salutation)
- Employment information (such as personnel type, department, agency, organization, job title, grade/series)
- Phone numbers (office, cell, fax, TTY<sup>11</sup>)
- Supervisor's contact information (name, email, phone)
- Physical address and mailing address

ACMS will now be storing the following in some cases of reasonable accommodation requests:

- Medical documentation (e.g., doctor's note, medical records)

**Privacy Risk:** There is a risk that medical data will not be properly matched up to the correct individual since the documentation can be submitted separately.

**Mitigation:** OAST cannot fully mitigate this risk. OAST is responsible for the system, database, and maintenance. If an individual submits a request for assistance via ACMS, the system will automatically create a ticket, including the attached documents the individual submitted, on the requester's behalf. Because this process is automatically handled by ACMS, there is no risk that an analyst would accidentally attach medical documentation to the wrong ticket.

However, integrity of reasonable accommodation data is under the responsibility of the respective DHS component's disability program office as each has the ownership of its respective reasonable accommodation requests. In an instance when an analyst is uploading documentation into a ticket on a customer's behalf, the analyst is asked to first verify the customer's name on the Ticket Management Screen prior to opening the ticket and to also verify the customer's information on the Contact screen located within the ticket before attaching documents. DHS components' disability program offices have their own practices in place; however, DPMs are asked to conduct ticket audits to ensure the proper information is being stored in each ticket.

**Privacy Risk:** Because individuals submitting a reasonable accommodation request can do so directly to the Accessibility Help Desk email inbox, there is a risk that analysts not assigned to a ticket, or without a need to know, may have unnecessary access to SPII.

**Mitigation:** OAST will mitigate this risk by providing additional notice to potential requestors that medical documentation should not be submitted directly to the Accessibility Help

---

[acms.](#)

<sup>11</sup> A TTY is a special device that lets people who are deaf, hard of hearing, or speech-impaired use the telephone to communicate, by allowing them to type text messages. A TTY is required at both ends of the conversation in order to communicate.



Desk email inbox. OAST will post the following language to the ACMS home page:

*“Any individuals who are requesting a Reasonable Accommodation must NOT send any medical documentation or any other sensitive information to the Accessibility Help Desk’s email address ([accessibility@hq.dhs.gov](mailto:accessibility@hq.dhs.gov)). This sensitive information must only be provided to the assigned analyst directly or submitted via the electronic form, which is accessible by clicking on the “Request Assistance” box at the top of this web page.”*

Additionally, OAST has provided guidance on how to handle medical documentation that is still received in the Accessibility Help Desk’s email inbox despite the warning.

1. The Accessibility Help Desk analyst must attach all medical documentation and other sensitive information to an accommodation ticket and assign the ticket to the appropriate analyst.
2. Next, the Accessibility Help Desk analyst must delete the medical documentation and other sensitive information from the Accessibility Help Desk’s email inbox and “Deleted Items” folder immediately. The accessibility analyst will not maintain any copy of the information. No medical documentation is emailed to the assigned analyst. The medical documentation is now only viewable in ACMS.
3. Lastly, the Accessibility Help Desk analyst will inform the person that emailed the sensitive information to only submit such information to his or her assigned analyst directly or via the ACMS “Request Assistance” form in the future.

## Uses of the System and the Information

The additional data added to a requestor’s reasonable accommodation request stored in ACMS will be medical documentation. This additional information now loaded into ACMS will allow for having a single data source for reasonable accommodation requests, which will eliminate the need to track down records stored in multiple locations. It will reduce further risk of the Department being unable to find all associated hard copies of data and other integral case information. It also reduces determination delays for reasonable accommodation requests.

**Privacy Risk:** There is a risk that analysts/users may gain inappropriate access to ACMS and misuse the information.

**Mitigation:** OAST mitigates this risk by providing extensive training to ACMS analysts/users and OAST requires individual accommodation information to remain private and only allows access by authorized personnel that have been vetted and granted access by the Component Accommodation Administrator. All analysts/users are required to read the ACMS User’s Guide before reaching the request access screen.<sup>12</sup> Also, OAST provides all analysts/users one-on-one training sessions using screen sharing to walk through ACMS. Finally, OAST also provides a Reasonable Accommodation Database Cheat Sheet with helpful directions to the accommodation analysts for their convenience. Tailored help screens for each ACMS page are

---

<sup>12</sup> OAST is developing a memorandum of agreement (MOA) so that all DPMs know their office responsibility for using ACMS.



present within the database as well. Access to ACMS is accomplished through establishing initial system requirements that support the common enterprise authentication platform implemented at DHS, including single sign-on using the DHS employee's current and valid credentials; Advanced Encryption Standard (AES) 256 encryption for data storage used to securely encrypt data and prevent unwanted access; and the ability to allow or restrict access to system functions, features, data, and documents based upon user role and identity. The Component Accommodation Administrator submits an additional confirmation of access, in writing, to the Accessibility Help Desk in order for any analyst to have access to his or her component's Reasonable Accommodation database. Component Accommodation Administrators can track access and access levels at all times via a User Account Access tool within ACMS, and the Accessibility Help Desk maintains overall user access.

## Retention

The retention timeframe of reasonable accommodations requests, including medical documentation, is three (3) years after separation from an agency, or when no longer needed for reference for an adjudication, whichever is later, or when a requestor submits a deletion request. The Reasonable Accommodations Records SORN<sup>13</sup> mandates this retention schedule, which allows the Department to collect and maintain records on individuals who requested or received reasonable accommodations.

**Privacy Risk:** There is a risk that information could be stored for longer than the required retention schedule of three years.

**Mitigation:** To mitigate this risk, OAST will conduct annual audits to identify tickets that are at least three years old that may require deletion. DPMS for DHS components are initially responsible for deleting any file attachments in ACMS that contain medical documentation or sensitive information. In reference to hard copy documents that may be collected outside of ACMS, DPMS are responsible for ensuring that all physical documents are disposed of properly. Disposal of medical documentation does not fall under the responsibility scope of OAST, but the annual audits OAST conducts will provide a more efficient process for ensuring timely destruction.

The retention timeframe for all data in ACMS has not changed with this update.

## Internal Sharing and Disclosure

Internal sharing and disclosure have not changed with this update.

## External Sharing and Disclosure

External sharing and disclosure have not changed with this update.

---

<sup>13</sup> See DHS/ALL-033 Reasonable Accommodations Records System of Records, 76 FR 41274 (July 13, 2011), available at <https://www.gpo.gov/fdsys/pkg/FR-2011-07-13/html/2011-17548.htm>.



## Notice

Notice has not changed with this update. However, an updated Privacy Act Statement has been added to the “Request Assistance” form available through the ACMS home page.

## Individual Access, Redress, and Correction

Access, redress, and correction have not changed with this update.

## Technical Access and Security

Technical access and security have not changed with this update.

## Technology

Technology has not changed with this update.

## Responsible Official

Bill Peterson  
Executive Director  
Office of Accessible Systems & Technology  
Office of Chief Information Officer  
Department of Homeland Security

## Approval Signature

Original, signed copy on file at DHS Privacy Office.

---

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