



Privacy Impact Assessment Update
for the

Chemical Security Assessment Tool (CSAT)

October 27, 2008

Contact Point

Dennis Deziel

National Protection & Programs Directorate
(703) 235-4908

Reviewing Official

Hugo Teufel III

Chief Privacy Officer

Department of Homeland Security
(703) 235-0780



Abstract

This is an update to the previous Chemical Security Assessment Tool (CSAT) Privacy Impact Assessment (PIA). CSAT collects personally identifiable information from CSAT users and CVI web site users. This update improves a CSAT user's ability to know who else in their company also has access to CSAT. Further, the CSAT Helpdesk collects contact information both from CSAT users requesting basic CSAT IT support and from the general public inquiring about the CSAT program. Provision of basic CSAT user information to the Helpdesk will allow quicker services and support.

Introduction

The Department of Homeland Security/National Protection & Programs Directorate (NPPD)/Chemical Security Assessment Tool (CSAT) is a suite of applications for use by applicable chemical sector entities as described in Section 550 of Public Law 109-295, which provides DHS the responsibility and authority to regulate high risk chemical facilities. This is an update to the previous CSAT Privacy Impact Assessment (PIA) in order to describe updated CSAT user visibility, and new provision to the Helpdesk of basic CSAT user information.

Reason for the PIA Update

This update addresses the addition to CSAT of user visibility of other user names and user roles within a company or entity. Also, this update documents how the CSAT Helpdesk receives user registration information to provide better customer service.

Previously, a CSAT user did not know who else in their company/entity had access to facility specific information within CSAT. This update to CSAT allows a CSAT user to see the names of other users from the same entity. This is a very minor change and is simply for the benefit of entities, allowing them to better manage their own CSAT users. Providing additional clarity about access and user roles will help ensure that entity user lists are accurate and up to date.

Previously the CSAT Helpdesk did not have the ability to verify when a caller was a CSAT user or was Chemical-Terrorism Vulnerability Information (CVI) authorized. CSAT will now provide the Helpdesk with basic user information. This will enable the Helpdesk to quickly recognize callers as CSAT users and verify when an individual caller is a CVI authorized user when a user. This will enable the Helpdesk to provide better customer service and do so in a more time-efficient manner.

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.

The System and the Information Collected and Stored within the System

Describe how this update affects the amount and type of personally identifiable information collected by the program or system, and how the update compliments the previously articulated purpose of the program.

No new information is collected.

Uses of the System and the Information

Describe how the uses of the personally identifiable information have changed with this update and whether any privacy risks exist as associated with such changes.

User Visibility – Previously, CSAT participants (Preparers, Submitters, Authorizers, and Reviewers) could not see who the other approved users were for their own companies/entities. Now, users within a specific entity will be able to view the names of other participating users within their own entity via CSAT. This will help to ensure that lists of registered users are kept accurate and up to date. This does not impact an individual's privacy because all individuals participating in CSAT from any given entity must be previously identified within their own entity prior to becoming CSAT users. The only information visible to users within the same entity are the names of the other users from that entity, and the CSAT user roles of those other users.

Helpdesk Sharing – Previously, the CSAT Helpdesk relied on registered CSAT users to provide their own information to the Helpdesk staff during each and every Helpdesk call. Now, CSAT will provide basic user registration information to the CSAT Helpdesk. This access to information will increase the effectiveness of CSAT customer service to existing users by decreasing the time it takes for the Helpdesk staff to identify a caller and begin providing assistance to that caller. The registration information shared with the Helpdesk includes the user's unique registration id, name, email, address, and phone number; as well as their related facility information such as facility name and location. The security of the data on the Helpdesk server is consistent with regular CSAT data security policies and practices and should not cause any increase in privacy risk.

Retention

Describe whether retention schedules have changed or if the system now has an approved NARA schedule.

There is no change to the retention schedule.

Internal Sharing and Disclosure

Describe how the internal sharing and disclosure have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

All internal sharing and disclosure of PII is still within DHS/NPPD/IP.



External Sharing and Disclosure

Describe how the external sharing and disclosure have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

CSAT continues to share limited PII with each organization submitting information via CSAT to confirm that individual users are the appropriate people to represent the organization, and to provide usernames and passwords for CSAT accounts. With this update CSAT users have the ability electronically to view the roles of other users within their organization. From time to time CSAT also shares limited PII with submitting organizations in the form of letters and emails to facilities apprising those organizations of their CSAT statuses and responsibilities.

Notice

Describe whether additional notice is required to describe new collections, uses, sharing, or retention of the data and how that has or will be done.

No additional notice is required.

Individual Access, Redress, and Correction

Describe how access, redress, and correction have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

There is no change to access, redress and correction with this update.

Technical Access and Security

Describe how the technical access and security have changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

The upload of PII from CSAT to the Helpdesk has not changed the technical access and security of CSAT as it is leveraging existing security features of LDAP and role-based access along with access to the data via https.



Technology

Describe how the technology has changed with this update and whether any privacy risks have been identified and if they have, mitigation for such risks.

The “technology” has not changed. All needed protections are in place.

Responsible Official

Dennis Deziel, Program Manager

National Protection & Programs Directorate (NPPD)

Department of Homeland Security

Approval Signature Page

Original signed and on file with the DHS Privacy Office

Hugo Teufel III

Chief Privacy Officer

Department of Homeland Security