



**Privacy Impact Assessment Update
for the**

PRISM System

DHS/OCPO/PIA-013(a)

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Abstract

The Department of Homeland Security (DHS) Management Directorate, Office of the Chief Procurement Officer (OCPO) is the owner of the PRISM contract writing management system. PRISM provides comprehensive, Federal Acquisition Regulation (FAR)-based acquisition support for all DHS headquarters entities. The purpose of this Privacy Impact Assessment (PIA) update is to reflect changes to the collection of information, and the addition of a classified PRISM system.

Introduction

The PRISM system has operated at DHS since 2004. The first PIA was completed in 2009. PRISM is a FAR-based contract writing and management system used by the Office of Procurement Operations, Immigration and Customs Enforcement (ICE), Federal Law Enforcement Training Center (FLETC) and Office of the Inspector General (OIG) procurement offices. A separate instance of the PRISM system will also be implemented for the Office of Selective Acquisition (OSA) on the C-LAN in Fiscal Year (FY) 2012. C-LAN operates as the DHS IT network for Top Secret/Sensitive Compartmented Information (TS/SCI) level. C-LAN ensures that Homeland Security intelligence missions are conducted appropriately, without compromising confidentiality, availability, or integrity of sensitive national security intelligence information.

Reason for the PIA Update

This PIA is being updated because of the new PRISM system that will be implemented for OSA on the C-LAN, and additional changes have been implemented that allow for the restriction of access to the Taxpayer Identification Number (TIN) to only those users who require it to perform their duties.

Privacy Impact Analysis

The System and the Information Collected and Stored within the System

There are no significant changes to the information collected and stored within the system. Additional users have been added to PRISM and additional vendors with vendor point of contact information have been added to the system.

The information that is collected, used, disseminated and maintained in the system has not changed as part of this update.



The sources of information in the system have not changed as part of this update.

The reason the information is being collected, used, disseminated and maintained has not changed as part of this update.

The information will be checked for accuracy in the same manner identified in the original PIA.

There is no change to the legal authorities, arrangements and/or agreements that define the collection of information.

PRISM collects the TIN in accordance with the Federal Acquisition Regulation subpart 4.9 Taxpayer Identification Number Information. In some rare cases the vendor TIN is the Social Security Number of an individual. This normally occurs when an individual is self-employed and chooses not to obtain a separate TIN for their business. PRISM has been configured to restrict access to the TIN to only those users who require it to perform their duties.

Uses of the System and the Information

The unclassified instance of PRISM will continue to transmit select PRISM information to the Federal Procurement Data Systems Next Generation (FPDS-NG) system. The unclassified instance of PRISM will also transmit solicitation and supporting data to FedConnect including Government contact information to allow bi-directional communication between DHS and potential vendors. The instance of PRISM that will reside on the C LAN will not transmit data to FPDS-NG or Fedconnect. OSA has received a waiver from the FAR requirement to report contracts to FPDS-NG. Use of Fedconnect is not mandated and OSA will not use it to perform its work at any time.

The types of tools that are used to analyze data and the type of data produced have not changed as part of this update.

The way in which the system uses commercial or publicly available data has not changed.

These updates do not result in any additional privacy risks.

Retention

The retention schedules have not changed.

Internal Sharing and Disclosure

On the unclassified instance of PRISM, no changes have been made relating to sharing of information with internal organizations.



A separate instance of PRISM will be added to the DHS network, but will only be accessible on the C-LAN. The other components that use PRISM (OPO, ICE, FLETC and OIG) will not have access to PRISM on the C-LAN. This instance will be solely for the use of the Office of Selective Acquisition. Access within the OSA instance of PRISM will be controlled through role-based and site-based access, as well as the use of security groups within PRISM preventing unauthorized sharing of information. The full content of each procurement record is visible to a limited number of authorized contracting staff across sites. This allows for contract data reuse, sharing of contracts, and information sharing on a need-to-know basis. This shared access allows OSA branches to take advantage of similar or identical procurement actions already in existence minimizing duplication of efforts which saves time and administrative cost.

On the unclassified instance of PRISM, no changes have been made to how the information is transmitted or disclosed.

Data from the OSA PRISM system will only be shared with DHS personnel with the appropriate clearance who have a need to know. Dissemination of PII is generally not required. However, were PII to be specifically requested, it would be processed at a higher management level for approval prior to dissemination.

In a recent update to PRISM, new functionality was added that allows access to the TIN to be restricted based on a user role. This functionality has been implemented so that only those employees who require access to the TIN are granted it. This functionality has helped to reduce the privacy risks associated with the information.

External Sharing and Disclosure

There are no changes for the unclassified instance of PRISM with regard to sharing of information external to organizations (posting contract actions to FPDS-NG). For the new classified instance of PRISM, no contract actions will be made public through FPDS-NG.

No changes have been made to the sharing of personally identifiable information outside the department that would require an update to the SORN.

No privacy risks have been identified as a result of these updates.

Notice

No new collections, uses, sharing or retention of data have been incorporated into the system since the date of the first Privacy Impact Assessment, and therefore no notice is required.



Individual Access, Redress, and Correction

The control of individual access to PRISM has been further enhanced through the use of automated Rules of Behavior. The Rules of Behavior for PRISM are displayed electronically to all new users prior to initial log in and annually thereafter. Users must agree to abide by the rules of behavior prior to logging in, if they do not agree, the system will not permit them to log in.

PRISM collects the TIN in accordance with the FAR subpart 4.9 Taxpayer Identification Number Information. In some rare cases the vendor TIN is the Social Security Number of an individual. This normally occurs when an individual is self employed and chooses not to obtain a separate TIN for their business. PRISM has been configured to restrict access to the TIN to only those users who require it to perform their duties.

There are no privacy risks associated with these updates. The updates enhance access control and help to mitigate privacy risks.

Technical Access and Security

Users who require access to the classified instance of PRISM will require a TS/SCI clearance prior to receiving a login account. These users will follow the same procedures addressed in section 8.1 of the original PIA.

There is a current Security Certification and Accreditation (C&A) for the unclassified instance of PRISM. The estimated completion date for the C&A of the classified instance of PRISM is March 1, 2012.



Technology

No changes have been made to the type of project, stage of development, or specific technology that might raise privacy concerns.

Responsible Official

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Approval Signature

[Original signed copy on file with the DHS Privacy Office]

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