



**USAID**  
FROM THE AMERICAN PEOPLE

## FOIAXpress/Public Access Link (PAL) Privacy Impact Assessment (PIA)

### UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

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Office of the Chief Information Officer (M/CIO)  
Information Assurance Division  
FOIAXpress/PAL  
Approved Date: November 23, 2016

#### Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

#### Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)



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## 1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

## 2 Information

### 2.1 Program and System Information

#### 2.1.1 Describe the PROGRAM and its PURPOSE.

The Bureau for Management (M), Office of Management Services (MS), Information and Records Division (IRD) utilizes FOIAXpress/Public Access Link (PAL), a web-based major application, in support of USAID's compliance requirements in 5 U.S.C. § 552 and 5 U.S.C. § 552a, along with Executive Orders relating to openness in government. FOIAXpress/PAL, allows members of the public to submit and track the status of Freedom of Information Act (FOIA) and Privacy Act (PA) requests electronically. The PAL portion of the FOIAXpress/PAL system is publicly accessible through the internet. All other parts of the system require access credentials to AIDNet in addition to FOIAXpress/PAL credentials.

FOIAXpress allows USAID to manage the entire lifecycle of a FOIA request, from the initial request to the final delivery of records. To process most FOIA requests, basic contact information is necessitated, including name, home address and email address.

For Privacy Act requests, individuals must complete USAID Form 507-1, the Freedom of Information/Privacy Act Record Request Form. For PA requesters, in addition to contact information, Form 507-1, in order to authenticate the individual requester, requires the requester's Social Security Number (SSN), and date and place of birth.

Currently, the SSN is sometimes used to verify an individual's identity, using Form 507-1, particularly in the case of two or more FOIA requesters who have the same name. Once the identity is verified, the FOIA Office sends the request to the appropriate program office(s) so that they may conduct a search of their systems to identify any potentially responsive records.

M/MS/IRD is researching alternative authentication/verification methods and is planning to eliminate the SSN collection from Form 507-1 by September 30, 2017, which directly follows the 8/31/17 expiration date of the OMB-approved form and coincides with the end of Fiscal Year 2017.



**2.1.2 Describe the SYSTEM and its PURPOSE.**

FOIAXpress provides the ability to manage the entire lifecycle of a FOIA request from the initial request to the final delivery of records. Components include management, correspondence management, document management, fee/payment management, document review and redaction, and reporting. The Public Access Link (PAL) is a public-facing web portal that complements the FOIAXpress tools by providing efficient and secure communication between agencies and the public. The purposes of this system include: (1) processing access requests and administrative appeals made under the FOIA, in addition to access and amendment requests and administrative appeals under the Privacy Act; (2) participating in litigation regarding agency action on such requests and appeals; and (3) assisting USAID in carrying out any other responsibilities related to FOIA and Privacy Act such as reporting to USAID and other federal executive officials.

M/MS/IRD’s FOIAXpress/PAL, a USAID major application, permits individuals to submit and track the status of Freedom of Information (FOIA) and Privacy Act (PA) requests electronically via the internet. All other parts of the system require access credentials to AIDNet in addition to FOIAXpress/PAL credentials. Through FOIAXpress, USAID manages the entire lifecycle of FOIA requests, from the initial request to the final delivery of records. In order to process most FOIA requests, basic contact information is necessitated, including name, home address and email address.

**2.1.3 What is the SYSTEM STATUS?**

- New System Development or Procurement
- Pilot Project for New System Development or Procurement
- Existing System Being Updated
- Existing Information Collection Form or Survey  
OMB Control Number:
- New Information Collection Form or Survey
- Request for Dataset to be Published on an External Website
- Other:

**2.1.4 What types of INFORMATION FORMATS are involved with the program?**

- Physical only
- Electronic only
- Physical and electronic combined

**2.1.5 Does your program participate in PUBLIC ENGAGEMENT?**

- No.
- Yes:
  - Information Collection Forms or Surveys
  - Third Party Web Site or Application
  - Collaboration Tool



2.1.6 What type of system and/or TECHNOLOGY is involved?
<input type="checkbox"/> Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
<input type="checkbox"/> Network
<input checked="" type="checkbox"/> Database
<input checked="" type="checkbox"/> Software
<input type="checkbox"/> Hardware
<input type="checkbox"/> Mobile Application or Platform
<input type="checkbox"/> Mobile Device Hardware (cameras, microphones, etc.)
<input type="checkbox"/> Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)
<input type="checkbox"/> Wireless Network
<input type="checkbox"/> Social Media
<input checked="" type="checkbox"/> Web Site or Application Used for Collaboration with the Public
<input type="checkbox"/> Advertising Platform
<input type="checkbox"/> Website or Webserver
<input checked="" type="checkbox"/> Web Application
<input type="checkbox"/> Third-Party Website or Application
<input type="checkbox"/> Geotagging (locational data embedded in photos and videos)
<input type="checkbox"/> Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
<input type="checkbox"/> Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)
<input type="checkbox"/> Facial Recognition
<input type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices
<input type="checkbox"/> Bring Your Own Device (BYOD)
<input checked="" type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input type="checkbox"/> Other:
<input type="checkbox"/> None



**2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?**

<input checked="" type="checkbox"/> Citizens of the United States
<input checked="" type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input checked="" type="checkbox"/> USAID employees and personal services contractors
<input checked="" type="checkbox"/> Employees of USAID contractors and/or services providers
<input checked="" type="checkbox"/> Aliens
<input checked="" type="checkbox"/> Business Owners or Executives
<input checked="" type="checkbox"/> Others:
<input type="checkbox"/> None

**2.2 Information Collection, Use, Maintenance, and Dissemination**

**2.2.1 What types of personal information do you collect, use, maintain, or disseminate?**

<input checked="" type="checkbox"/> Name, Former Name, or Alias
<input checked="" type="checkbox"/> Mother's Maiden Name
<input checked="" type="checkbox"/> Social Security Number or Truncated SSN (only for Privacy requests and as required by USAID Form 507-1)
<input checked="" type="checkbox"/> Date of Birth
<input checked="" type="checkbox"/> Place of Birth
<input checked="" type="checkbox"/> Home Address
<input checked="" type="checkbox"/> Home Phone Number
<input checked="" type="checkbox"/> Personal Cell Phone Number
<input checked="" type="checkbox"/> Personal E-Mail Address
<input checked="" type="checkbox"/> Work Phone Number
<input checked="" type="checkbox"/> Work E-Mail Address
<input checked="" type="checkbox"/> Driver's License Number (only when necessary to process the request)
<input checked="" type="checkbox"/> Passport Number or Green Card Number (only when necessary to process the request)
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input type="checkbox"/> Tax Identification Number
<input type="checkbox"/> Credit Card Number or Other Financial Account Number

### 2.2.1 What types of personal information do you collect, use, maintain, or disseminate?

<input type="checkbox"/> Patient Identification Number
<input checked="" type="checkbox"/> Employment or Salary Record
<input checked="" type="checkbox"/> Medical Record
<input checked="" type="checkbox"/> Criminal Record
<input checked="" type="checkbox"/> Military Record
<input checked="" type="checkbox"/> Financial Record
<input checked="" type="checkbox"/> Education Record
<input type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input type="checkbox"/> Sex or Gender
<input type="checkbox"/> Age
<input type="checkbox"/> Other Physical Characteristic (eye color, hair color, height, tattoo)
<input type="checkbox"/> Sexual Orientation
<input checked="" type="checkbox"/> Marital status or Family Information
<input checked="" type="checkbox"/> Race or Ethnicity
<input type="checkbox"/> Religion
<input checked="" type="checkbox"/> Citizenship
<input type="checkbox"/> Other:
<input type="checkbox"/> No PII is collected, used, maintained, or disseminated

### 2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?

<input checked="" type="checkbox"/> Log Data (IP address, time, date, referrer site, browser type)
<input type="checkbox"/> Tracking Data (single- or multi-session cookies, beacons)
<input type="checkbox"/> Form Data
<input checked="" type="checkbox"/> User Names
<input checked="" type="checkbox"/> Passwords (only stored for PAL users, because system access for USAID users enter FOIAXpress via a PIV/Single Sign-On)
<input type="checkbox"/> Unique Device Identifier



**2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?**

<input type="checkbox"/> Location or GPS Data
<input type="checkbox"/> Camera Controls (photo, video, videoconference)
<input type="checkbox"/> Microphone Controls
<input type="checkbox"/> Other Hardware or Software Controls
<input type="checkbox"/> Photo Data
<input type="checkbox"/> Audio or Sound Data
<input type="checkbox"/> Other Device Sensor Controls or Data
<input type="checkbox"/> On/Off Status and Controls
<input type="checkbox"/> Cell Tower Records (logs, user location, time, date)
<input type="checkbox"/> Data Collected by Apps (itemize)
<input type="checkbox"/> Contact List and Directories
<input type="checkbox"/> Biometric Data or Related Data
<input type="checkbox"/> SD Card or Other Stored Data
<input type="checkbox"/> Network Status
<input type="checkbox"/> Network Communications Data
<input type="checkbox"/> Device Settings or Preferences (security, sharing, status)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

**2.2.4 Who owns and/or controls the system involved?**

<input checked="" type="checkbox"/> USAID Office: M/MS/IRD
<input type="checkbox"/> Another Federal Agency:
<input type="checkbox"/> Contractor:
<input checked="" type="checkbox"/> Cloud Computing Services Provider: Terremark Federal Group (TMMS)
<input type="checkbox"/> Third-Party Website or Application Services Provider:
<input type="checkbox"/> Mobile Services Provider:
<input type="checkbox"/> Digital Collaboration Tools or Services Provider:
<input type="checkbox"/> Other:



### 3 Privacy Risks and Controls

#### 3.1 Authority and Purpose (AP)

##### **3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?**

22 C.F.R. § 215, Regulations for Implementation of the Privacy Act of 1974; 22 C.F.R. 212, Regulations for Implementation of the Freedom of Information Act; 5 USC 552 FOIA and 5 USC 552a Privacy Act.

##### **3.1.2 Why is the PII collected and how do you use it?**

The FOIA allows members of the public to request access to records from federal agencies in order to learn about their government. Federal agencies are required to disclose any information requested under the FOIA unless it falls under one of nine exemptions which protect interests such as personal privacy, national security, and law enforcement. Privacy Act requests allow members of the public to request information held about themselves by the Federal Government. FOIAXpress/PAL, which is used by USAID to track FOIA and Privacy Act requests, collects PII from an individual Privacy Act requester for the purpose of identifying records contained within a USAID System of Records pertaining to that requester. FOIA requesters are required to provide their home address and/or email address in order to respond to the requester appropriately. Additionally, for Privacy Act requests and Privacy Act amendments, in order to authenticate the individual requester's identity, USAID collects the SSN, date and place of birth. For either a FOIA or Privacy Act request, individuals must create an account in order to request copies of records afforded to them. Currently, the SSN is also used to verify an individual's identity. Once this occurs, the FOIA Office sends the request to the appropriate program office(s) so that they may conduct a search of their systems to identify any potentially responsive records. M/MS/IRD is researching alternative authentication methods and plans to eliminate the SSN collection from Form 507-1 by September 30, 2017, which directly follows the 8/31/17 expiration date of the OMB-approved Form 507-1 and coincides with the end of Fiscal Year 2017.

##### **3.1.3 How will you identify and evaluate any possible new uses of the PII?**

The PII in FOIAXpress/PAL exists solely to respond to FOIA and Privacy Act requests for specified Agency records. It has no other authorized use. Any additional request for an authorized use must be directed to the System Owner.

## 3.2 Accountability, Audit, and Risk Management (AR)

### 3.2.1 Do you use any data collection forms or surveys?

No:

Yes:

Form or Survey: FOIA/Privacy Act Record Request Form (AID 507-1): <https://www.usaid.gov/forms/aid-507-1>

OMB Number, if applicable: 0412-0589

Privacy Act Statement: See: <https://www.usaid.gov/forms/aid-507-1>

### 3.2.3 Who owns and/or controls the personal information?

USAID Office:

Another Federal Agency:

Contractor:

Cloud Computing Services Provider:

Third-Party Web Services Provider:

Mobile Services Provider:

Digital Collaboration Tools or Services Provider:

Other:

### 3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?

No.

Yes:

## 3.3 Data Quality and Integrity (DI)

### 3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?

FOIA and Privacy Act requests come directly from the individual seeking the information, or through a representative via the PAL website or Form 507-1, which is used for Privacy Act requests and verification of identity. With respect to the requested Agency records, these records are already in existence and are collected only because they are responsive to the request.

<b>3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?</b>
FOIA personnel commence collection of responsive records whenever they reach the request in the queue. Before information is released to the requester, a Senior FOIA Specialist reviews the final response letter and confirms that the mailing address or email address is accurate as part of the QA/QC process.

<b>3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?</b>
Inaccuracies might be found by the FOIA Specialist during the process of responding to a request and gathering the necessary documents. If inaccuracies were found, the Specialist works directly with the responsive program office to correct them. In addition, if a requester moves to a different address before USAID’s response has been completed, it is incumbent upon the requester to contact M/MS/IRD to update the records.  For Privacy information, there is a specific procedure under the regulations at 22 CFR 215 for correcting any inaccurate or outdated PII. When the request is for personal information, USAID receives PII from the requester to verify his or her identity. Although USAID does not routinely scan FOIAXpress to further determine if PII is accurate, this verification takes place in the initial stages of reviewing an incoming request.

### 3.4 Data Minimization and Retention (DM)

<b>3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?</b>
USAID collects only the PII necessary to process a request. For all FOIA and Privacy Act requests, the requester’s name, address, phone number, and email address may be collected so USAID may contact and follow-up with the requesters. Additionally, for Privacy Act requests and Privacy Act amendments, in order to authenticate the individual requester’s identity, USAID collects the SSN, date and place of birth. M/MS/IRD is researching alternative authentication methods and plans to eliminate the SSN collection from Form 507-1 by September 30, 2017, which directly follows the 8/31/17 expiration date of the OMB-approved form and coincides with the end of Fiscal Year 2017.

<b>3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?</b>
<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes:

**3.4.4 What types of reports about individuals can you produce from the system?**

USAID may run a number of reports using FOIAXpress. For example, reports may be generated on the requester's history of FOIA requests, or based on a particular topic. A report may also be conducted relating to a particular country or region, or a statistical report for agency leadership, USDOJ, and/or members of Congress.

**3.4.6 Does the system monitor or track individuals?**

*(If you choose Yes, please explain the monitoring capability.)*

No.

Yes:

**3.5 Individual Participation and Redress (IP)****3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?**

No. The requesters contact M/MS/IRD and request specified information. By virtue of a signed request, consent is provided by the requester for the Agency to process and respond to the request.

**3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?**

One of the purposes of M/MS/IRDIRD is to assist individuals to gain access to and/or to amend their PII when requested.

**3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?**

The FOIAXpress/PAL's virtual servers are provided via Infrastructure as a Service (IaaS) and reside within USAID's Terremark Managed Services (TMMS) FedRAMP-approved cloud solution in Miami, Florida. FOIAXpress is considering a transition to a FedRAMP-approved cloud configuration in the future.

Meanwhile, the process for requesting access to and amending PII remains the same. FOIA requesters request access and provide updates to their information, such as contact information, as necessary by contacting their assigned FOIA Analyst or sending email to [foia@usaid.gov](mailto:foia@usaid.gov). As a result, these changes are made by M/MS/IRD staff within FOIAXpress.

### 3.7 Transparency (TR)

#### 3.7.1 Do you retrieve information by personal identifiers, such as name or number?

*(If you choose Yes, please provide the types of personal identifiers that are used.)*

- No.
- Yes: Name Only (may also use FOIA Tracking Number, company, and/or specific search terms based on the information requested)

#### 3.7.2 How do you provide notice to individuals regarding?

The current Privacy Act Statement is below; however, no later than September 30, 2017, the Statement will be revised as part of the SSN reduction/elimination measures currently under development.

1) The authority to collect PII:

5 U.S.C. 301; 5 U.S.C. 552; 5 U.S.C. 552a; 44 U.S.C. 3101; and 22 CFR 212 and 215, and the applicable executive order(s) governing classified national security information.

2) The principal purposes for which the PII will be used:

To allow the USAID Information Records Division to electronically process and track the status of Freedom of Information (FOIA) and Privacy Act (PA) requests.

3) The routine uses of the PII:

The personal information requested will be used by FOIAXpress to manage the entire lifecycle of FOIA and PA requests, from the initial request to the final delivery of records. Pursuant to Privacy Act System of Records Notice USAID-25, Freedom of Information Act, Privacy Act, and Mandatory Declassification Review Requests Records System of Records, USAID will share this information only with government agencies that have the statutory and lawful authority to maintain such information for specified purposes, such as the National Archives and Records Administration, U.S. Department of Justice, Department of State, and other federal agencies.

4) The effects on the individual, if any, of not providing all or any part of the PII:

Disclosure of your personal information in FOIAXpress/PAL is voluntary, but failure to do so may prevent USAID from fulfilling your FOIA or PA Request.

#### 3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?

- No
- Yes: AID 25 – FOIA, PA, and Mandatory Declassification Review Request Records, 79 FR 7164 (Feb. 6, 2014)

#### 3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?

The PII is stored on FOIAXpress/PAL's virtual servers, which are provided via IaaS and reside within USAID's TMMS FedRAMP-approved cloud solution in Miami, Florida.

### 3.8 Use Limitation (UL)

#### 3.8.1 Who has access to the PII at USAID?

The PAL portion of the FOIAXpress/PAL system is publicly accessible through the internet. All other parts of the system require access credentials to AIDNet, in addition to FOIAXpress/PAL credentials, based on a “need to know.” Only M/MS/IRD employees and/or contractors immediately responsible for processing FOIA requests and updating information in the database, along with their managers, are granted FOIAXpress/PAL access credentials.

#### 3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?

FOIAXpress is not used to share PII outside of USAID. However, if information is requested by USDOJ’s Office of the U.S. Attorneys in response to litigation about a FOIA request, it may be shared through a separate secured email process. In addition USAID may share information with NARA and the State Department as part of routine uses as described in SORN AID 25.

#### 3.8.4 Do you share PII outside of USAID? If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?

- No.  
 Yes:

### 3.9 Third-Party Web Sites and Applications

#### 3.9.1 What PII *could be made available* (even though not requested) to USAID or its contractors and service providers when engaging with the public?

Only personnel from the FOIA/PA Office and AINS, the FOIAXpress vendor, have access to the data supplied by requesters via FOIAXpress online. The FOIAXpress System is covered by password controls and security layers and is undergoing the USAID SA&A process.

## Appendix A. Links and Artifacts

<b>A.1 Privacy Compliance Documents or Links</b>
<input type="checkbox"/> None. There are no documents or links that I need to provide.
<input type="checkbox"/> Privacy Threshold Analysis (PTA)
<input type="checkbox"/> Privacy Impact Assessment (PIA)
<input type="checkbox"/> System of Records Notice (SORN)
<input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA)
<input type="checkbox"/> Data Collection Forms or Surveys
<input type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices
<input type="checkbox"/> USAID Web Site Privacy Policy
<input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application
<input type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents