06.1 HHS Privacy Impact Assessment (Form) / NIH NLM Lost Person Finder (Item)

PIA SUMMARY	

1	

The following required questions with an asterisk (*) represent the information necessary to complete the PIA Summary for transmission to the Office of Management and Budget (OMB) and public posting in accordance with OMB Memorandum (M) 03-22.

Note: If a question or its response is not applicable, please answer "N/A" to that question where possible. If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of personally identifiable information (PII). If no PII is contained in the system, please answer questions in the PIA Summary Tab and then promote the PIA to the Senior Official for Privacy who will authorize the PIA. If this system contains PII, all remaining questions on the PIA Form Tabs must be completed prior to signature and promotion.

2	**Summary of PIA Required Questions**

*Is this a new PIA?

No

If this is an existing PIA, please provide a reason for revision:

PIA Validation

*1. Date of this Submission:

Aug 14, 2012

*2. OPDIV Name:

NIH

*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):

09-25-0200

*5. OMB Information Collection Approval Number:

0925-0612

*6. Other Identifying Number(s):

No

*7. System Name (Align with system item name):

NIH/National Library of Medicine (NLM) Lost Person Finder System (LPF)

*9. System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:

Point of Contact Information	
POC Name	Michael Gill

*10. Provide an overview of the system:

The National Library of Medicine (NLM) Lost Person Finder (LPF) project includes Web-based components that collect data to facilitate reunification efforts during or after a disaster event. This data is collected as part of NLM's mission to develop and coordinate communication technologies to improve delivery of health services. NLM is a member of the Bethesda Hospitals' Emergency Preparedness Partnership (BHEPP), which was established in 2004 to improve community disaster preparedness and response among hospitals in Bethesda, Maryland that would likely be called upon to absorb mass causalities in a major disaster in the National Capital Region or other areas. The BHEPP hospitals include the National Naval Medical Center (NNMC), the National Institutes of Health Clinic Center (NIH CC), and Suburban Hospital/Johns Hopkins Medicine. With its expertise in communications, information management, and medical informatics, NLM joined BHEPP to coordinate the R&D program, one of which is development of a person locator tool to assist in family reunification after a disaster.

*13. Indicate if the system is new or an existing one being modified:

Existing
17. Does/Will the system collect, maintain (store), disseminate and/or pass through PII within any database(s), record(s), file(s) or website(s) hosted by this system?
TIP: If the answer to Question 17 is "No" (indicating the system does not contain PII), only the remaining PIA Summary tab questions need to be completed and submitted. If the system does contain PII, the full PIA must be completed and submitted. (Although note that "Employee systems," – i.e., systems that collect PII "permitting the physical or online contacting of a specific individual … employed [by] the Federal Government – only need to complete the PIA Summary tab.)
Yes
17a. Is this a GSS PIA included for C&A purposes only, with no ownership of underlying application data? If the response to Q.17a is Yes, the response to Q.17 should be No and only the PIA Summary must be completed.
No
19. Are records on the system retrieved by 1 or more PII data elements?
Yes
21. Is the system subject to the Privacy Act? (If the response to Q.19 is Yes, the response to Q.21 must be Yes and a SORN number is required for Q.4)
Yes
23. If the system shares or discloses PII, please specify with whom and for what purpose(s):
Yes. Information is shared with, disclosed or transferred to: (1) BHEPP participating hospitals' personnel; (2) the general public via an interactive Web-based system that allows individuals to search for missing family members that may have been recovered (or found) post-disaster; (3) other people locator systems endorsed by U.S. government agencies to ensure that comprehensive data is available to users of such systems and to ensure that use of the NLM system in no way interrupts or distracts from the operation or use of other people locator systems.
30. Please describe in detail: (1) The information the agency will collect, maintain, or disseminate (clearly state if the information contained in the system ONLY represents federal contact data); (2) Why and for what purpose the agency will use the information; (3) Explicitly indicate whether the information contains PII; and (4) Whether submission of personal information is voluntary or mandatory:
The primary uses of the Lost Person Finder project components are to facilitate reunification efforts during or after a disaster. Subsequently, the NLM will use the data to evaluate the functioning and utility of the LPF components and similar technologies and guide future enhancements to the system. Collection of this information is authorized pursuant to sections 301, 307, 465, and 478A of the Public Health Service Act [42 U.S.C. 241, 242l, 286, and 286d] which authorizes the HHS Secretary to conduct and support research. The information collected, maintained and disseminated includes personally identifiable information (or PII) and is collected on a voluntary basis. Biographical information physical identifying characteristics will be collected, maintained, and disseminated.
31. Please describe in detail any processes in place to: (1) Notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection); (2) Notify and obtain consent from individuals regarding what PII is being collected from them; and (3) How the information will be used or shared. (Note: Please describe in what format individuals will be given notice of consent [e.g., written notice, electronic notice, etc.]):
(1) There is no process for obtaining consent from individuals whose PII is maintained in the system when major system changes occur. (2) Information is collected on a voluntary basis. (3) Information is posted on the LPF Web site notifying users about how their information will be shared.
32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)
Yes
37. Does the website have any information or pages directed at children under the age of thirteen?
No
50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN)
Yes
54. Briefly describe in detail how the PII will be secured on the system using administrative, technical, and physical controls:
PII is secured by NLM's controlled access computer room (Technical/Physical), Access to system must be requested in writing from NLM program staff (Administrative).

PIA REQUIRED INFORMATION

1	HHS Privacy Impact Assessment (PIA)

The PIA determines if Personally Identifiable Information (PII) is contained within a system, what kind of PII, what is done with that information, and how that information is protected. Systems with PII are subject to an extensive list of requirements based on privacy laws, regulations, and guidance. The HHS Privacy Act Officer may be contacted for issues related to Freedom of Information Act (FOIA) and the Privacy Act. Respective Operating Division (OPDIV) Privacy Contacts may be contacted for issues related to the Privacy Act. The Office of the Chief Information Officer (OCIO) can be used as a resource for questions related to the administrative, technical, and physical controls of the system. Please note that answers to questions with an asterisk (*) will be submitted to the Office of Management and Budget (OMB) and made publicly available in accordance with OMB Memorandum (M) 03-22.

Note: If a question or its response is not applicable, please answer "N/A" to that question where possible.

2	General Information

*Is this a new PIA?

No

If this is an existing PIA, please provide a reason for revision:

PIA Validation

*1. Date of this Submission:

Aug 14, 2012

*2. OPDIV Name:

NIH

3. Unique Project Identifier (UPI) Number for current fiscal year (Data is auto-populated from the System Inventory form, UPI table):

*4. Privacy Act System of Records Notice (SORN) Number (If response to Q.21 is Yes, a SORN number is required for Q.4):

09-25-0200

*5. OMB Information Collection Approval Number:

0925-0612

5a. OMB Collection Approval Number Expiration Date:

*6. Other Identifying Number(s):

No

*7. System Name: (Align with system item name)

NIH/National Library of Medicine (NLM) Lost Person Finder System (LPF)

8. System Location: (OPDIV or contractor office building, room, city, and state)

System Location:	
OPDIV or contractor office building	Building 38A
Room	Data Center, Room B1W17
City	Bethesda
State	Maryland

*9. System Point of Contact (POC). The System POC is the person to whom questions about the system and the responses to this PIA may be addressed:

Point of Contact Information	

POC Name	Michael Gill

POC Title	Electronics Engineer
POC Organization	National Institutes of Health/National Library of Medicine/Lister Hill National Center for Biomedical Communications/Communications Engineering Branch
POC Phone	301-435-3212
POC Email	mgill@mail.nih.gov

*10. Provide an overview of the system: (Note: The System Inventory form can provide additional information for child dependencies if the system is a GSS)

The National Library of Medicine (NLM) Lost Person Finder (LPF) project includes Web-based components that collect data to facilitate reunification efforts during or after a disaster event. This data is collected as part of NLM's mission to develop and coordinate communication technologies to improve delivery of health services. NLM is a member of the Bethesda Hospitals' Emergency Preparedness Partnership (BHEPP), which was established in 2004 to improve community disaster preparedness and response among hospitals in Bethesda, Maryland that would likely be called upon to absorb mass causalities in a major disaster in the National Capital Region or other areas. The BHEPP hospitals include the National Naval Medical Center (NNMC), the National Institutes of Health Clinic Center (NIH CC), and Suburban Hospital/Johns Hopkins Medicine. With its expertise in communications, information management, and medical informatics, NLM joined BHEPP to coordinate the R&D program, one of which is development of a person locator tool to assist in family reunification after a disaster.

SYSTEM CHARACTERIZATION AND DATA CATEGORIZATION	
1 **System Characterization and Data Configuration**	
11. Does HHS own the system?	
Yes	
11a. If no, identify the system owner:	
12. Does HHS operate the system? (If the system is operated at a contractor site, the answer should be No)	
Yes	
12a. If no, identify the system operator:	
*13. Indicate if the system is new or an existing one being modified:	
Existing	
14. Identify the life-cycle phase of this system:	
Development/Acquisition	
15. Have any of the following major changes occurred to the system since the PIA was last submitted?	
No	

Please indicate "Yes" or "No" for each category below:	Yes/No
Conversions	No
Anonymous to Non-Anonymous	No
Significant System Management Changes	No
Significant Merging	No
New Public Access	No
Commercial Sources	No
New Interagency Uses	No
Internal Flow or Collection	No
Alteration in Character of Data	No

16. Is the system a General Support System (GSS), Major Application (MA), Minor Application (child) or Minor Application (stand-alone)?	
Minor Application (stand-alone)	
*17. Does/Will the system collect, maintain (store), disseminate and/or pass through PII within any database(s), record(s), file(s) or website(s) hosted by this system?	
Yes	
TIP: If the answer to Question 17 is "No" (indicating the system does not contain PII), only the remaining PIA Summary tab questions need to be completed and submitted. If the system does contain PII, the full PIA must be completed and submitted. (Although note that "Employee systems," – i.e., systems that collect PII "permitting the physical or online contacting of a specific individual … employed [by] the Federal Government – only need to complete the PIA Summary tab.)	
Please indicate "Yes" or "No" for each PII category. If the applicable PII category is not listed, please use the Other field to identify the appropriate category of PII.	

Categories:	Yes/No

Name (for purposes other than contacting federal employees)	Yes
Date of Birth	Yes
Social Security Number (SSN)	No
Photographic Identifiers	Yes
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	Yes
Personal Phone Numbers	Yes
Medical Records Numbers	No
Medical Notes	Yes
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	Yes
Web Uniform Resource Locator(s) (URL)	No
Personal Email Address	Yes
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No
Other	Yes; mass casualty identifier, last seen location

17a. Is this a GSS PIA included for C&A purposes only, with no ownership of underlying application data? If the response to Q.17a is Yes, the response to Q.17 should be No and only the PIA Summary must be completed.

No

18. Please indicate the categories of individuals about whom PII is collected, maintained, disseminated and/or passed through. Note: If the applicable PII category is not listed, please use the Other field to identify the appropriate category of PII. Please answer "Yes" or "No" to each of these choices (NA in other is not applicable).

Categories:	**Yes/No**
Employees	No
Public Citizen	Yes

Patients	Yes
Business partners/contacts (Federal, state, local agencies)	No
Vendors/Suppliers/Contractors	No
Other	Yes, Non-US Citizens are possible.

19. Are records on the system retrieved by 1 or more PII data elements?

Yes

Please indicate "Yes" or "No" for each PII category. If the applicable PII category is not listed, please use the Other field to identify the appropriate category of PII.

Categories:	Yes/No
Name (for purposes other than contacting federal employees)	Yes
Date of Birth	No
SSN	No
Photographic Identifiers	Yes
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	Yes
Personal Phone Numbers	Yes
Medical Records Numbers	No
Medical Notes	Yes
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	Yes
Web URLs	No
Personal Email Address	Yes
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No

Other	Yes; mass casualty identifiers, last seen location

20. Are 10 or more records containing PII maintained, stored or transmitted/passed through this system?
Yes
*21. Is the system subject to the Privacy Act? (If the response to Q.19 is Yes, the response to Q.21 must be Yes and a SORN number is required for Q.4)
Yes
21a. If yes but a SORN has not been created, please provide an explanation.
N/A

INFORMATION SHARING PRACTICES

1	Information Sharing Practices

22. Does the system share or disclose PII with other divisions within this agency, external agencies, or other people or organizations outside the agency?

Yes

Please indicate "Yes" or "No" for each category below:	Yes/No
Name (for purposes other than contacting federal employees)	Yes
Date of Birth	Yes
SSN	No
Photographic Identifiers	Yes
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	Yes
Personal Phone Numbers	Yes
Medical Records Numbers	No
Medical Notes	Yes
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	Yes
Web URLs	No
Personal Email Address	Yes
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No
Other	Yes; mass casualty identifiers, last seen location

*23. If the system shares or discloses PII please specify with whom and for what purpose(s):

Yes. Information is shared with, disclosed or transferred to: (1) BHEPP participating hospitals' personnel; (2) the general public via an interactive Web-based system that allows individuals to search for missing family members that may have been recovered (or found) post-disaster; (3) other people locator systems endorsed by U.S. government agencies to ensure that comprehensive

data is available to users of such systems and to ensure that use of the NLM system in no way interrupts or distracts from the operation or use of other people locator systems.

24. If the PII in the system is matched against PII in one or more other computer systems, are computer data matching agreement(s) in place?

Not Applicable

25. Is there a process in place to notify organizations or systems that are dependent upon the PII contained in this system when major changes occur (i.e., revisions to PII, or when the system is replaced)?

Yes

26. Are individuals notified how their PII is going to be used?

Yes

26a. If yes, please describe the process for allowing individuals to have a choice. If no, please provide an explanation.

Information is collected on a voluntary basis. A Privacy Act statement is provided in the LPF project components to notify individuals about the uses of their PII.

27. Is there a complaint process in place for individuals who believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate?

Yes

27a. If yes, please describe briefly the notification process. If no, please provide an explanation.

There is no formal complaint process in place if PII is inappropriately obtained, used, or disclosed; however, a technical support email address is provided for the LPF project components. The information provided to the LPF Web site may not be moderated, and NLM and other contributing organizations may not review or verify the accuracy of any information that is submitted to the LPF Web site.

28. Are there processes in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy?

No

28a. If yes, please describe briefly the review process. If no, please provide an explanation.

The information provided to the LPF Web site may not be moderated, and NLM and other contributing organizations may not review or verify the accuracy of any information that is submitted to the LPF Web site.

29. Are there rules of conduct in place for access to PII on the system?

Yes

Please indicate "Yes," "No," or "N/A" for each category. If yes, briefly state the purpose for each user to have access:

Users with access to PII	Yes/No/N/A	Purpose
User	Yes	Search and submit information
Administrators	Yes	Search, edit, and delete information
Developers	Yes	Search and submit information
Contractors	Yes	Search and submit information
Other	Not Applicable	

*30. Please describe in detail: (1) The information the agency will collect, maintain, or disseminate (clearly state if the information contained in the system ONLY represents federal contact data); (2) Why and for what purpose the agency will use the information; (3) Explicitly indicate whether the information contains PII; and (4) Whether submission of personal information is voluntary or mandatory:

The primary uses of the Lost Person Finder project components are to facilitate reunification efforts during or after a disaster. Subsequently, the NLM will use the data to evaluate the functioning and utility of the LPF components and similar technologies and guide future enhancements to the system. Collection of this information is authorized pursuant to sections 301, 307, 465, and 478A of the Public Health Service Act [42 U.S.C. 241, 242l, 286, and 286d] which authorizes the HHS Secretary to conduct and support research. The information collected, maintained and disseminated includes personally identifiable information (or PII) and is collected on a voluntary basis. Biographical information physical identifying characteristics will be collected, maintained, and disseminated.

31. Please describe in detail any processes in place to: (1) Notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection); (2) Notify and obtain consent from individuals regarding what PII is being collected from them; and (3) How the information will be used or shared. (Note: Please describe in what format individuals will be given notice of consent [e.g., written notice, electronic notice, etc.])

(1) There is no process for obtaining consent from individuals whose PII is maintained in the system when major system changes occur. (2) Information is collected on a voluntary basis. (3) Information is posted on the LPF Web site notifying users about how their information will be shared.

WEBSITE HOSTING PRACTICES

1	Website Hosting Practices

32. Does the system host a website? (Note: If the system hosts a website, the Website Hosting Practices section is required to be completed regardless of the presence of PII)

Yes

Please indicate "Yes" or "No" for each type of site below. If the system hosts both Internet and Intranet sites, indicate "Yes" for "Both" only.	Yes/ No	If the system hosts an Internet site, please enter the site URL. Do not enter any URL(s) for Intranet sites.
Internet	Yes	http://pl.nlm.nih.gov ; http://lpfbeta.nlm.nih.gov
Intranet	Yes	
Both	Yes	

33. Does the system host a website that is accessible by the public and does not meet the exceptions listed in OMB M-03-22?

Note: OMB M-03-22 Attachment A, Section III, Subsection C requires agencies to post a privacy policy for websites that are accessible to the public, but provides three exceptions: (1) Websites containing information other than "government information" as defined in OMB Circular A-130; (2) Agency intranet websites that are accessible only by authorized government users (employees, contractors, consultants, fellows, grantees); and (3) National security systems defined at 40 U.S.C. 11103 as exempt from the definition of information technology (see section 202(i) of the E-Government Act.).

Yes

34. If the website does not meet one or more of the exceptions described in Q. 33 (i.e., response to Q. 33 is "Yes"), a website privacy policy statement (consistent with OMB M-03-22 and Title II and III of the E-Government Act) is required. Has a website privacy policy been posted?

Yes

35. If a website privacy policy is required (i.e., response to Q. 34 is "Yes"), is the privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)?

Yes

35a. If no, please indicate when the website will be P3P compliant:

36. Does the website employ tracking technologies?

Yes

Please indicate "Yes", "No", or "N/A" for each type of cookie below:	Yes/No/N/A
Web Bugs	No
Web Beacons	No
Session Cookies	Yes
Persistent Cookies	No
Other	No

37. Does the website have any information or pages directed at children under the age of thirteen?

No

37a. If yes, is there a unique privacy policy for the site, and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
N/A	
38. Does the website collect PII from individuals?	
Yes	

Please indicate "Yes" or "No" for each category below:	Yes/No
Name (for purposes other than contacting federal employees)	Yes
Date of Birth	Yes
SSN	No
Photographic Identifiers	Yes
Driver's License	No
Biometric Identifiers	No
Mother's Maiden Name	No
Vehicle Identifiers	No
Personal Mailing Address	Yes
Personal Phone Numbers	Yes
Medical Records Numbers	No
Medical Notes	Yes
Financial Account Information	No
Certificates	No
Legal Documents	No
Device Identifiers	Yes
Web URLs	No
Personal Email Address	Yes
Education Records	No
Military Status	No
Employment Status	No
Foreign Activities	No
Other	Yes; mass casualty identifier, last seen location

39. Are rules of conduct in place for access to PII on the website?	
Yes	
40. Does the website contain links to sites external to HHS that owns and/or operates the system?	

Yes
40a. If yes, note whether the system provides a disclaimer notice for users that follow external links to websites not owned or operated by HHS.
Yes a disclaimer notice exists.

ADMINISTRATIVE CONTROLS	
1	**Administrative Controls**
Note: This PIA uses the terms "Administrative," "Technical" and "Physical" to refer to security control questions—terms that are used in several Federal laws when referencing security requirements.	
41. Has the system been certified and accredited (C&A)?	
No	
41a. If yes, please indicate when the C&A was completed:	
41b. If a system requires a C&A and no C&A was completed, is a C&A in progress?	
No	
42. Is there a system security plan for this system?	
No	
43. Is there a contingency (or backup) plan for the system?	
No	
44. Are files backed up regularly?	
No	
45. Are backup files stored offsite?	
No	
46. Are there user manuals for the system?	
No	
47. Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been trained and made aware of their responsibilities for protecting the information being collected and maintained?	
Yes	
48. If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?	
Yes	
49. Are methods in place to ensure least privilege (i.e., "need to know" and accountability)?	
Yes	
49a. If yes, please specify method(s):	
(1) SecureID for authentication to privilidge users (2) Login w/ least privilidges permitted and escalation as needed (3) Eventsys used to keep copies of all logs and events on a separate system	
*50. Are there policies or guidelines in place with regard to the retention and destruction of PII? (Refer to the C&A package and/or the Records Retention and Destruction section in SORN):	
Yes	
50a. If yes, please provide some detail about these policies/practices:	
Statement in SORN 09-25-0200: Clinical, Basic and Population-based Research Studies of the National Institutes of Health (NIH), HHS/NIH/OD, regarding retention and disposal. "Records are retained and disposed of under the authority of the NIH Records Control Schedule contained in NIH Manual Chapter 1743, Appendix 1B "Keeping and Destroying Records" (HHS Records Management Manual, Appendix B-361), item 3000-G-3, which allows records to be kept as long as they are useful in scientific research. Collaborative Perinatal Project records are retained in accordance with item 3000-G-4, which does not allow records to be destroyed. Refer to the NIH Manual Chapter for specific conditions on disposal or retention instructions."	

TECHNICAL CONTROLS

1	Technical Controls

51. Are technical controls in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system?

Yes

Please indicate "Yes" or "No" for each category below:	Yes/No
User Identification	Yes
Passwords	Yes
Firewall	Yes
Virtual Private Network (VPN)	No
Encryption	No
Intrusion Detection System (IDS)	Yes
Common Access Cards (CAC)	No
Smart Cards	No
Biometrics	No
Public Key Infrastructure (PKI)	Yes

52. Is there a process in place to monitor and respond to privacy and/or security incidents?

Yes

52a. If yes, please briefly describe the process:

(1) Monitoring done by NLM/OCCS IDS systems (2) NLM/ISSO responsible for assigning response to incidents.

PHYSICAL ACCESS	
1 **Physical Access**	

53. Are physical access controls in place?

Yes

Please indicate "Yes" or "No" for each category below:	Yes/No
Guards	Yes
Identification Badges	Yes
Key Cards	Yes
Cipher Locks	No
Biometrics	Yes
Closed Circuit TV (CCTV)	Yes

*54. Briefly describe in detail how the PII will be secured on the system using administrative, technical, and physical controls:

PII is secured by NLM's controlled access computer room (Technical/Physical), Access to system must be requested in writing from NLM program staff (Administrative).

APPROVAL/DEMOTION	
1 **System Information**	
System Name:	NIH/National Library of Medicine (NLM) Lost Person Finder System (LPF)
2 **PIA Reviewer Approval/Promotion or Demotion**	
Promotion/Demotion:	Promote
Comments:	
Approval/Demotion Point of Contact:	Dar-Ning Kung
Date:	Aug 14, 2012
3 **Senior Official for Privacy Approval/Promotion or Demotion**	
Promotion/Demotion:	Promote
Comments:	
4 **OPDIV Senior Official for Privacy or Designee Approval**	

Please print the PIA and obtain the endorsement of the reviewing official below. Once the signature has been collected, retain a hard copy for the OPDIV's records. Submitting the PIA will indicate the reviewing official has endorsed it

This PIA has been reviewed and endorsed by the OPDIV Senior Official for Privacy or Designee (Name and Date):

Name: _____   Date: _____

Name:	Karen Plá
Date:	Sep 28, 2012

5 **Department Approval to Publish to the Web**	
Approved for web publishing	
Date Published:	
Publicly posted PIA URL or no PIA URL explanation:	

PIA % COMPLETE	
1 **PIA Completion**	
PIA Percentage Complete:	100.00
PIA Missing Fields:	