



U.S. Department of the Interior

PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the DOI PIA Guide for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

| | | | | | |
|---|------------|------|-----------------------------|----------------|-------|
| Name of Project | | | | Date | |
| Proposed Information Collection: Use of iNaturalist by the NPS to Record Natural History Observations | | | | 12-28-2015 | |
| Bureau/Office | | | Bureau/Office Contact Title | | |
| NPS - NRSS | | | Data Manager | | |
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Section 1. General System Information

A. Is a full PIA required?

Yes

Yes, information is collected from or maintained on

All

B. What is the purpose of the system?

The information in iNaturalist is entered into the NPS NPSpecies data system. NPSpecies is used to record the occurrence of wildlife and plants in NPS units (parks). The information from iNaturalist helps to substantiate the occurrence of wildlife and invertebrate species (observations) in those NPS units. This includes species that are threatened and endangered. This information will enable parks to report accurate numbers to the Fish and Wildlife Service on expenditures by the NPS to improve park habitat and increase protections for those listed species. The information is also used to create species checklists for use by park visitors. The information can also be used to alert

park managers about the status of species that may be of local management concern or are categorized as invasive or noxious and require coordinated treatment efforts.

The Natural Resource Stewardship and Science Directorate (NRSS) provides scientific, technical, and administrative support to national parks for the management of natural resources. NRSS develops, utilizes, and distributes the tools of natural and social science to help the National Park Service (NPS) fulfill its core mission: the protection of park resources and values.

NRSS provides leadership and expertise to ensure understanding, awareness, representation, and stewardship of the natural resources of the NPS so that they remain unimpaired for future generations.

C. What is the legal authority?

16 U.S.C. 1, National Park Service Organic Act; 16 U.S.C. 3, Rules and regulations of national parks, reservations, and monuments

D. Why is this PIA being completed or modified?

New Electronic Collection

E. Is this information system registered in CSAM?

No

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

| Subsystem Name | Purpose | Contains PII | Describe |
|-----------------------|----------------|---------------------|-----------------|
| None | NA | No | |

G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?

No

H. Does this information system or electronic collection require an OMB Control Number?

Yes

Describe

Control # is pending

Section 2. Summary of System Data

A. What PII will be collected? Indicate all that apply.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Religious Preference | <input type="checkbox"/> Social Security Number (SSN) |
| <input type="checkbox"/> Citizenship | <input type="checkbox"/> Security Clearance | <input type="checkbox"/> Personal Cell Telephone Number |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Spouse Information | <input type="checkbox"/> Tribal or Other ID Number |
| <input type="checkbox"/> Birth Date | <input type="checkbox"/> Financial Information | <input type="checkbox"/> Personal Email Address |
| <input type="checkbox"/> Group Affiliation | <input type="checkbox"/> Medical Information | <input type="checkbox"/> Mother's Maiden Name |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Disability Information | <input type="checkbox"/> Home Telephone Number |
| <input type="checkbox"/> Biometrics | <input type="checkbox"/> Credit Card Number | <input type="checkbox"/> Child or Dependent Information |
| <input type="checkbox"/> Other Names Used | <input type="checkbox"/> Law Enforcement | <input type="checkbox"/> Employment Information |
| <input type="checkbox"/> Truncated SSN | <input type="checkbox"/> Education Information | <input type="checkbox"/> Military Status/Service |
| <input type="checkbox"/> Legal Status | <input type="checkbox"/> Emergency Contact | <input type="checkbox"/> Mailing/Home Address |
| <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Driver's License | |
| <input checked="" type="checkbox"/> Other | <input type="checkbox"/> Race/Ethnicity | |

Specify the PII collected.

iNaturalist.org system username

B. What is the source for the PII collected? Indicate all that apply.

- | | | | |
|---|--|--|---------------------------------------|
| <input type="checkbox"/> Individual | <input type="checkbox"/> Tribal agency | <input type="checkbox"/> DOI records | <input type="checkbox"/> State agency |
| <input type="checkbox"/> Federal agency | <input type="checkbox"/> Local agency | <input checked="" type="checkbox"/> Third party source | <input type="checkbox"/> Other |

C. How will the information be collected? Indicate all that apply.

- | | | | |
|---------------------------------------|---|---|---|
| <input type="checkbox"/> Paper Format | <input type="checkbox"/> Face-to-Face Contact | <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input type="checkbox"/> Email | <input checked="" type="checkbox"/> Web Site | <input checked="" type="checkbox"/> Other | <input type="checkbox"/> Information Shared Between Systems |

Describe

Download data from third-party iNaturalist website (www.inaturalist.org) after public has entered information using either mobile devices (e.g., iPhone or Android phone) or website. These data submitted to iNaturalist are available for public use with attribution. No special agreement is required to download the data.

D. What is the intended use of the PII collected?

We intend to use the username and/or individual's name to comply with license requirements for attribution present on each observation record in iNaturalist when using natural history observation information from the iNaturalist system.

E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.

- Within the Bureau/Office

Describe the bureau or office and how the data will be used.

The observer's name or iNaturalist username will be available in the NPSpecies data system when a natural history observation made by that observer is displayed, in order to properly attribute the observation to that individual.

- Other Bureaus/Offices

Describe the bureau or office and how the data will be used.

The observer's name or iNaturalist username will be available in the NPSpecies data system when a natural history observation made by that observer is displayed, in order to properly attribute the observation to that individual.

- Other Federal Agencies

Describe the federal agency and how the data will be used.

The observer's name or iNaturalist username will be available in the NPSpecies data system when a natural history observation made by that observer is displayed, in order to properly attribute the observation to that individual.

- Tribal, State or Local Agencies

Describe the Tribal, state or local agencies and how the data will be used.

The observer's name or iNaturalist username will be available in the NPSpecies data system when a natural history observation made by that observer is displayed, in order to properly attribute the observation to that individual.

Contractor

Describe the contractor and how the data will be used.

The observer's name or iNaturalist username will be available in the NPSpecies data system when a natural history observation made by that observer is displayed, in order to properly attribute the observation to that individual.

Other Third Party Sources

Describe the third party source and how the data will be used.

The observer's name or iNaturalist username will be available in the NPSpecies data system when a natural history observation made by that observer is displayed, in order to properly attribute the observation to that individual.

The NPSpecies data system has a public-facing interface. Therefore, the information will be available to anyone who accesses the NPSpecies system.

F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?

Yes

Describe the method by which individuals can decline to provide information or how individuals consent to specific uses.

- Individuals may decline to post observation to iNaturalist when on NPS lands
- Per the iNaturalist Privacy Policy, "visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities"
- Individuals may restrict rights to reuse observations in iNaturalist

G. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

Privacy Act Statement Privacy Notice Other None

Describe each applicable format.

The third-party iNaturalist.org website provides an explicit Privacy Policy at <http://www.inaturalist.org/pages/privacy>

H. How will data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).

Data collected from the iNaturalist.org website will be entered into the NPSpecies System where observations will be retrieved by selecting a NPS unit (e.g., park, monument, national historic site) or by a taxon (organism) and an NPS unit.

I. Will reports be produced on individuals?

No

Section 3. Attributes of System Data

A. How will data collected from sources other than DOI records be verified for accuracy?

Verification of data accuracy is done at the iNaturalist.org website. The iNaturalist Terms of Service govern rules for creating an iNaturalist account. NPS collects the data from iNaturalist.org as provided by the individual to the iNaturalist.org website.

B. How will data be checked for completeness?

Verification for completeness of data is done at the iNaturalist.org website. The iNaturalist Terms of Service govern rules for creating an iNaturalist account. NPS collects the data from iNaturalist.org as provided by the individual to the iNaturalist.org website.

C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

The username and/or actual name associated with an observation are automatically added to the observation in

iNaturalist by virtue of the account that was logged in when the observation was created. This information should not change as it is a fundamental property of the unique observation.

D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.

Per the NPS Records Schedule of February, 2010 (NI-79-08-1), natural resource records are considered permanent records. These records will be transferred to NARA after three years, though they will still be maintained in the NPSpecies system.

E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?

Per the NPS Records Schedule of February, 2010 (NI-79-08-1), natural resource records are considered permanent records. These records will be transferred to NARA after three years, though they will still be maintained in the NPSpecies system.

F. Briefly describe privacy risks and how information handling practices at each stage of the "information lifecycle" (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.

Privacy risks associated with the third-party iNaturalist system are mitigated per the Privacy Policy detailed on that site at <http://www.inaturalist.org/pages/privacy>

Privacy risks associated with the natural history observations that are loaded into the NPSpecies data system from the iNaturalist system are minimal. This is because the only PII that is included in the NPSpecies data system is iNaturalist username and/or actual name (if provided) of the individual who observed an organism in an NPS unit. This information alone does not provide contact information for an individual.

Section 4. PIA Risk Review

A. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes

Explanation

The purpose of adding iNaturalist observations to the NPSpecies system is to help substantiate the occurrence of wildlife and invertebrate species in NPS units. This includes species that are threatened and endangered. This information will enable parks to report accurate numbers to the Fish and Wildlife Service on expenditures by the NPS to improve park habitat and increase protections for those listed species. The information is also used to create species checklists for use by park visitors. The information can also be used to alert park managers about the status of species that may be of local management concern or are categorized as invasive or noxious and require coordinated treatment efforts.

The observer's name or iNaturalist username will be available in the NPSpecies data system when a natural history observation made by that observer is displayed, in order to properly attribute the observation to that individual.

B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?

No

C. Will the new data be placed in the individual's record?

No

D. Can the system make determinations about individuals that would not be possible without the new data?

No

E. How will the new data be verified for relevance and accuracy?

Not applicable.

F. Are the data or the processes being consolidated?

No, data or processes are not being consolidated

G. Who will have access to data in the system or electronic collection? Indicate all that apply.

Users

Developers

System Administrator

Contractors

Other

H. How is user access to data determined? Will users have access to all data or will access be restricted?

Natural history observations in the NPSpecies data system will be available to the general public through the web-based application. The username and/or actual name of the observer is part of this information.

I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?

Yes

Were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?

Contractors are employed in the development of the software for the NPSpecies system. Contractors are required to adhere to directives and policies related to practices and procedures required by the U.S. Department of the Interior (DOI), the National Park Service, and any other government oversight offices.

J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

No

K. Will this system provide the capability to identify, locate and monitor individuals?

No

L. What kinds of information are collected as a function of the monitoring of individuals?

Not applicable.

M. What controls will be used to prevent unauthorized monitoring?

Not applicable.

N. How will the PII be secured?

(1) Physical Controls. Indicate all that apply.

- Security Guards Secured Facility Identification Badges Combination Locks
- Key Cards Closed Circuit Television Safes Locked Offices
- Locked File Cabinets Cipher Locks Other

(2) Technical Controls. Indicate all that apply.

- Password Intrusion Detection System (IDS)
- Firewall Virtual Private Network (VPN)
- Encryption Public Key Infrastructure (PKI) Certificates
- User Identification Personal Identity Verification (PIV) Card
- Biometrics
- Other

(3) Administrative Controls. Indicate all that apply.

- Periodic Security Audits Regular Monitoring of Users' Security Practices
- Backups Secured Off-site Methods to Ensure Only Authorized Personnel Have Access to PII
- Rules of Behavior Encryption of Backups Containing Sensitive Data
- Role-Based Training Mandatory Security, Privacy and Records Management Training
- Other

O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.

Natural Resource Stewardship and Science Directorate (NRSS) staff responsible for the management and operation of the NPSpecies data system.

P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?

Natural Resource Stewardship and Science Directorate (NRSS) staff responsible for the management and operation of the NPSpecies data system.

Section 5. Review and Approval

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