

Privacy Impact Assessment

Name of Project: Presidential Libraries Vista Admission System
Project's Unique ID: VISTA

SYSTEM APPLICATION/GENERAL INFORMATION:

1. What is the purpose of the system/application?

The system is used to:

- Facilitate the admission process for visitors to the Presidential Libraries' museum
- Schedule and process individuals and groups for tours, public programs, education programs, etc.
- To manage room reservations, at some Presidential Libraries

2. What legal authority authorizes the purchase or development of this system/application?

44 U.S.C. 2108, 2111 note, and 2203(f)(1), and NARA 101, Part 4.1.

DATA in the SYSTEM

1. Describe the information (data elements and fields) available in the system in the following categories:

a. Employees: The system only maintains information about an employee that is related to his or her duties, including user ID and password. If an employee attends a high-profile event, more information may be collected (see below).

b. External Users: For groups that interact with each Presidential Library, such as elementary school groups, boy scout troops, tour groups, and other groups of people that use the Library, information is stored by group name. An individual (such as a tour leader or a teacher) is assigned to the group. The information collected about this individual is limited to their phone number or email from their place of work. On occasion, such as for events involving VIPs where attendance must be monitored at an individual level, individual information will be collected by the system, including address and telephone number. Credit card information is also collected by the system when used to pay for admission.

c. Audit trail information (including employee log-in information): VISTA tracks the username of the last user to modify a record as well as the username of the user who first created the record.

d. Other (describe): VISTA maintains many data elements and fields related to programs and events such as time, location, program type, organization type, event name, resources used, etc.

2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.

- a. NARA operational records:** Libraries will maintain output reports from the VISTA system in conjunction with the reporting requirements of the Data Warehouse.
- b. External users:** VISTA processes visitors to the Library. These visitors either walk-up to visit the museum or are scheduled as groups in special events and programs that the Library may schedule. Data is input at the time of the walk-up or when a special event, program, or tour is scheduled.
- c. Employees:** Information about employees is entered into VISTA as part of a security module that establishes user rights to VISTA. An employee's information might also be entered if he or she participates in a special event.
- d. Other Federal agencies (list agency):** At some Presidential Libraries where we offer combined admittance with a National Park Service (NPS) site, NPS will receive visitor data including attendance and revenue information.
- e. State and local agencies (list agency):** N/A.
- f. Other third party source:** N/A.

3. Is each data element required for the business purpose of the system? Explain.

Yes, VISTA requires basic identification information about visitors and NL maintains that individuals attending high-profile events should be entered into the system.

4. How will data be verified for accuracy, timeliness, and completeness?

Each Library has a general data policy which guides users in how to input information. Part of NL's program review process includes a review of a Library's VISTA database to ensure that information is entered in a uniform manner and to ensure that events recorded by VISTA are given some kind of disposition (e.g. completed, cancelled, no-show, etc).

5. Is there another source for the data? Explain how that source is or is not used?

There is no other source for data other than what is collected by staff members for walk-up visitation and the scheduling/execution of events.

ATTRIBUTES OF THE DATA

1. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

No.

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

N/A.

3. Can the system make determinations about employees/public that would not be possible without the new data?

Through aggregate data compiled in reports, VISTA will assist Library staff members in making determinations about groups that may visit the Library. VISTA also collects ticket type information, so that a Library is able to make determinations about very general demographic information such as numbers of youths, adults, or seniors who visit the Library. No determinations will be made based on individual records.

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

VISTA tabulates the number of visitors and how they interact with each Library at the time of the visit and interaction. The data is, therefore, as accurate as possible. Nevertheless, Presidential Libraries maintain paper records related to each event and receipts are maintained for transactions at the admissions desk. This information provides a check on the accuracy of the system.

5. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

Access to the data is managed by VISTA's security module which allows the VISTA administrator to assign user names and passwords to every person using the software. These users are organized by groups such as "scheduler" or "front desk staff," and rights are allocated based on these groups. For example, a user who is assigned to the "front desk staff" group has limited access to VISTA. She or he can only interact with the point-of-sale admissions portion of the software.

Additionally, all NHT standards for access to NARANET are applied to ensure an additional level of protection and all NHI requirements for systems security have been incorporated.

6. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?

Yes, see 5.

7. Generally, how will the data be retrieved by the user?

Data is retrieved by regular users during the course of their duties. For example, a scheduler of events will often use VISTA to verify the mailing address of a particular group.

8. Is the data retrievable by a personal identifier such as a name, SSN or other unique identifier?

In most cases, data is retrievable by group name or confirmation number associated with a walk-up visitor transaction or the scheduling of an event. Individual names can be used to retrieve data in the case of group attendance or an individual's participation in a high-profile event.

9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

With regard to individual information that will be captured in VISTA, reports can be produced related to transactions, attendance, confirmation letters, and nature of the individual's interaction with the Library. Only confirmation letters will be used in order to allow Presidential Library staff to confirm a group's arrival or an individual's attendance at a high-profile event. Event schedulers and administrators have access to this report.

10. What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how can individuals grant consent?

Individuals can refuse to provide information at any time. A Library staff member may need to inform the individual about how this will affect their reservation to a group or special event.

11. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?

N/A.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

Presidential Libraries offer a host of different public and education programs, price points for walk-up sales, and other events. VISTA was implemented in order to facilitate these processes for each Presidential Library. Additionally, each has similar, but often unique business needs for using the VISTA system. NL requires that all attendance information is entered into VISTA, and this data is reviewed by NL during site visits, during program reviews, and soon with the assistance of the data warehouse feature.

2. What are the retention periods of data in this system?

All data is maintained in the system indefinitely with the exception of credit card data. Credit card data will be purged regularly after 45 days until the latest VISTA upgrade is deployed. This new version of VISTA encrypts all data while it is at rest.

3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Retention of these records is ongoing, and no disposition time-frame has yet been established. In theory, they will be maintained throughout the life of the system in order to ensure that visitor data may be analyzed over larger periods of time. The Office of Presidential Libraries will continue to assess the retention needs for this information.

4. Is the system using technologies in ways that the Agency has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

Part of the VISTA system includes a data warehouse feature. A Structured Query Language (SQL) script is installed on the system's server and it regularly tabulates raw attendance numbers and makes this information available to NL via web interface.

5. How does the use of this technology affect public/employee privacy?

The technology transfers raw attendance numbers that are publicly available. Therefore, it has no affect on public/employee privacy.

6. Will this system be used to identify, locate, and monitor individuals? If yes, describe the business purpose for the capability and the controls established explain.

VISTA will be used to identify individuals who represent groups that have or will visit a Presidential Library. Data will be maintained in individual records for high-profile events where individual information must be maintained for the security purposes.

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

Individuals that are group leaders are identified by name as well as the phone number and/or email address at their place of business. Individuals participating in a high profile event are often identified with this information as well as address.

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

Staff members are only given access to information they will use as part of their duties per the security module. However, VISTA does contain an audit feature which captures user information and date-stamps any change to the data or the system.

The software is available on staff members' computers via client technology, and it is password protected both at the VISTA and Novell levels. Also, the server is secured in each Library's server room and is also password protected.

All data that is transferred via NARANET is encrypted by VISTA during the transfer.

9. Can the use of the system allow NARA to treat the public, employees or other differently?

No.

10. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?

No.

11. Under which Privacy Act systems of records notice does the system operate? Provide number and name.

There is no notice to which VISTA is applicable. Because the data within VISTA is searched by name, a new system of records notice will be published.

12. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

N/A.

ACCESS TO DATA

1. Who will have access to the data in the system (e.g., contractors, users, managers, system administrators, developers, other)?

Certain Library staff, related to visitor services or scheduling of Library events, have access to the system. Library Directors and their Deputies also have access to the system. In several instances where the Presidential Library works closely with another institution, such as a Library Foundation, staff is given limited access to the VISTA system via a dedicated NARA workstation.

2. How is access to the data by a user determined and by whom? Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where are they documented (e.g., concept of operations document, etc.)?

Access to the data is managed by VISTA's security module which allows the VISTA administrator to assign user names and passwords to every person using the software. These users are organized by groups such as "scheduler" or "front desk staff," and rights are allocated based on these groups. For example, a user who is assigned to the "front desk staff" group has limited access to VISTA. She or he can only interact with the point-of-sale admissions portion of the software.

3. Will users have access to all data on the system or will the user's access be restricted? Explain.

The level of user access to data is controlled through VISTA's security module. Each user is assigned to a group (administrator, scheduler, front desk staff, etc) and their level of access is determined by the rights assigned to the group to which they belong.

4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those who have been granted access?

Staff members are only given access to information they will use as part of their duties per the security module. VISTA contains an audit feature which captures user information and date-stamps any change to the data or the system.

5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Ticketmaster is the contractor for the VISTA system, and Ticketmaster representatives have been involved in configuring VISTA systems at each Presidential Library – these actions involved little or no contact with any real data. From time to time, Ticketmaster has and will be involved in the maintenance of the system. These actions also involve little or no interaction with a Library's data. Nevertheless, the contracts by which Ticketmaster provides service and support for VISTA stipulate that the data is owned by NARA and may not be used in any way by Ticketmaster.

6. Do other NARA systems provide, receive or share data in the system?

No.

7. Have the NARA systems described in item 6 received an approved Security Certification and Privacy Impact Assessment?

N/A.

8. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

N/A.

9. Will other agencies share data or have access to the data in this system (Federal, State, Local, or Other)? If so list the agency, state how the data will be used and the official responsible for proper use of the data.

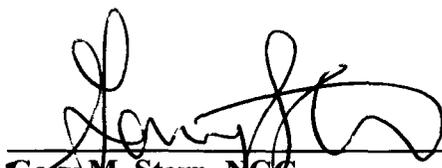
At the Franklin D. Roosevelt Presidential Library (NLFDR), the National Park Service

will have access to reports generated by the VISTA system as part of the close working relationship between the Library and the Roosevelt – Vanderbilt National Historic Sites. Ultimately, proper distribution and use of the data generated by NLFDR’s VISTA system will be the responsibility of Library management, specifically the Deputy Director.

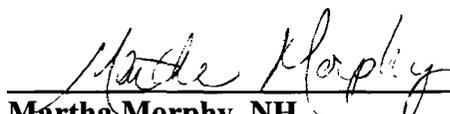
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