Integration:
Records Management & Privacy

Office of the Chief Information Officer

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Agenda

• Privacy requirements drivers
• How much integration is practical?
• Privacy requirements universe
• Records management integration opportunities
• Summary
Privacy Requirements Drivers

- Privacy Act of 1974 (PA)
- E-Government Act of 2002 (E-Gov Act)
- Children’s Online Privacy Protection Act of 1998 (COPPA)
- Paperwork Reduction Act of 1995 (PRA)
- Numerous OMB instructions
How much integration is practical?

• Records management and privacy management
  – Both demanding endeavors
  – Each requires multiple people
• Combining into one position is problematic.
• However…
  – there are areas of common ground that present
great opportunities for collaboration!
  – Same organization works well.
Meeting Privacy requirements involves expertise from two primary realms:

- **Information Management**
  Subject and user notifications, access rights, system assessments, rules of conduct, etc.

- **IT Security**
  Encryption, two-factor authentication, remote access time-out, other security controls, etc.
Privacy Act concerns “Systems of Records” (SORs)

- information about an individual … from which
- information is retrieved by individual’s name or identifying number, symbol, or other identifying particular assigned to the individual.

Requirement:

- Federal Register SORs Notices (including thorough records description and retention information)

Opportunity – Partner with records management:

- To schedule records covered by the Privacy Act
- To provide input to SOR description of records for FR notice
Privacy Requirements:
RM Integration Opportunity 2

E-Gov Act Requires:
Privacy Impact Assessment (PIA) - analysis of how information is handled to ensure privacy requirements compliance, determine risks, and alternatives.

- Required of all electronic Information Systems that collect, maintain, or distribute information in identifiable form (IIF) on members of the public.

- **Problem:** In order to know whether a PIA is required, system owner must know whether the applications contain IIF.

- **Opportunity:** Devise agency application/system information analysis to determine the nature of information the application will collect/maintain – including records.
In Summary

• Records Management and Privacy both concern information management.

• Look for leverage points in processes required by other information functions.

• Agencies should work toward holistic approach to controlling and managing information.