

From: Bowman, Randal
To: [Aaron Moody](#)
Subject: Re: Invitation: DiscoverText Follow-Up @ Wed May 17, 2017 1pm - 2pm (randal_bowman@ios.doi.gov)
Date: Wednesday, May 17, 2017 1:41:40 PM

I just came from a meeting with them, and I think you can call off the privacy expert. Everything they are doing seems required, Amy Holly has talked to them, and they are moving at extraordinary speed (for them) to give us a conditional approval to use the system. The problem is that FWS and apparently the other bureaus have totally ignored multiple privacy and computer security requirements while contracting for the various analytical systems they use for reg comments.

What I really need advice on is (b) (5) ACP
? That has to go into the approval paperwork,
and I have no idea on that. (b) (5) ACP

On Wed, May 17, 2017 at 2:10 PM, Aaron Moody <aaron.moody@sol.doi.gov> wrote:
I put the question to one of our privacy act experts in SOL. Will let you know when I hear back.

Sent from my iPad

On May 17, 2017, at 10:09 AM, Bowman, Randal <randal_bowman@ios.doi.gov> wrote:

FYI. While it looks like this won't complicate our work on this, what they are doing seems to have the potential to complicate future public comment processes by the Department and the bureaus. Alternatively, it might simplify it.

----- Forwarded message -----

From: Andrew W Havely <andrew_havely@ios.doi.gov>
Date: Wed, May 17, 2017 at 10:01 AM
Subject: Re: Invitation: DiscoverText Follow-Up @ Wed May 17, 2017 1pm - 2pm (randal_bowman@ios.doi.gov)
To: "Bowman, Randal" <randal_bowman@ios.doi.gov>, "Barnett, Teri" <teri_barnett@ios.doi.gov>

Great questions. To your last, my understanding based on the conversation we had with Sylvia last week is that we are likely to grant a conditional Authority to Operate specifically so that we do not cause delay to the project. We'll do the Information Assurance work concurrently so that we have a record that we have indeed conducted an evaluation. And it's distinctly possible that we won't be done with that work before you're done using the system. But that at least means we won't be scrambling the next time any bureau in the Department wants to use this system - so it's valuable work.

I'll leave the other questions to Teri to answer definitively but in short, because the [regs.gov](https://www.regulations.gov) site is a Privacy Act system of record, the controls that govern records captured there extend to the transfer of data from that system to another (meaning that we need to evaluate the controls of the DiscoverText system and its hosting provider). As you point out, the information is publicly available already. So among the information assurance triad of protecting data confidentiality, integrity, and availability, the one that matters most is clearly integrity. And you're absolutely right that any work FWS have done, and any documents they've produced in this regard is directly applicable and may completely obviate the need for us to do more. We'll talk about that on our call today and I'm hopeful Marcia will be able to join us!

Teri - more to add?

-andrew



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www.doi.gov/ocio

From: Bowman, Randal <randal_bowman@ios.doi.gov>
Reply: Bowman, Randal <randal_bowman@ios.doi.gov>
Date: May 17, 2017 at 7:02:04 AM
To: Barnett, Teri <teri_barnett@ios.doi.gov>
Cc: Andrew Havely <andrew_havely@ios.doi.gov>
Subject: Re: Invitation: DiscoverText Follow-Up @ Wed May 17, 2017 1pm - 2pm (randal_bowman@ios.doi.gov)

Apologies for not asking this initially, but I have a couple of underlying questions:

Given that any PII that a member of the public may submit despite our disclaimer -

“Before including your name, address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from

public review, we cannot guarantee that we will be able to do so.”

- will likely be available to the entire world on the [regs.gov](https://www.regulations.gov) site, what is the reason for a privacy impact assessment (PIA)? How long would this likely take and what aspects of the monument review would it address? Are these normally done for Federal Register public comment requests?

Similarly, it is my understanding – on which I am waiting for confirmation – that the comment processing system will not sort records by name or other PII unless we specifically direct that it be programmed to do so, which we will not, and given that any PII submitted is publicly available as per above, what is the purpose of the privacy clauses and breach provisions being added to the contract?

My concern here is delay, not avoiding compliance with legal requirements. I fully understand that contractors need security and privacy act training, for example, but expected that FWS had taken care of that given their long use of the system.

I would greatly appreciate at least a summary response to these questions before our meeting at 1 today so I can be prepared for discussion.

On Tue, May 16, 2017 at 6:10 PM, Andrew Havelly
<andrew_havelly@ios.doi.gov> wrote:

DiscoverText Follow-Up

[more details »](#)

A placeholder for a follow-up discussion on DiscoverText and Information Assurance activities. I've blocked an hour on our calendars but am hopeful we won't need the full time. Please feel free to forward this invitation to others I may have omitted or who may have a role in managing the DiscoverText system.

1pm Eastern in the OS-OCIO Sweet Gum Conference Room 7115 MIB or
Teleconference - (b) (5) CIP

When Wed May 17, 2017 1pm – 2pm Eastern Time

Where OS-OCIO Sweet Gum Conference Room 7115 MIB; Teleconference -
(b) (5) CIP [map](#))

Video call (b) (5) CIP

Calendar randal_bowman@ios.doi.gov

Who • andrew_havelly@ios.doi.gov - organizer

- bruce_downs@ios.doi.gov
- louis_eichenbaum@ios.doi.gov
- teri_barnett@ios.doi.gov
- randal_bowman@ios.doi.gov
- Lawrence_Ruffin@ios.doi.gov
- marcia_cash@fws.gov
- oluwarotimi_abimbola@ios.doi.gov

Going? [Yes](#) - [Maybe](#) - [No](#) [more options »](#)

Invitation from [Google Calendar](#)

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