OCIO Office of the DOT
Chief Information Officer

U.S. Department of Transportation
Federal Highways Administration (FHWA)

Privacy Impact Assessment
Transportation Research Collaboration Site (TRCS)

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Executive Summary

Transportation Research Collaboration Site (TRCS) is a professional networking and communications Web site, hosted by the Federal Highway Administration (FHWA) for the greater Department of Transportation (DOT), which provides virtual workspaces (communities) for members of the transportation community to collaborate and share ideas on numerous transportation topics. This Privacy Impact Assessment (PIA) is being conducted because registering and maintaining an account for this Web site requires participants to establish unique user profiles that include Personally Identifiable Information (PII).

Privacy Impact Assessment (PIA)

The Privacy Act of 1974 articulates concepts for how the Federal Government should treat individuals and their information and imposes duties upon Federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.[1]

Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we collect, store, retrieve, use and share. It is a comprehensive analysis of how the DOT's electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:

- *Making informed policy and system design or procurement decisions. These decisions must be based on an understanding of privacy risk, and of options available for mitigating that risk;*
- *Accountability for privacy issues;*
- *Analyzing both technical and legal compliance with applicable privacy law and regulations, as well as accepted privacy policy; and*
- *Providing documentation on the flow of personal information and information requirements within DOT systems.*

Upon reviewing the PIA, the public should have a broad understanding of the risks and potential effects associated with the Department activitiesm, processes, and systems described and approaches taken to mitigagte any potential privacy risks.

Overview of TRCS

TRCS is a collaboration site for the Department of Transportation's (DOT) externally-facing research communities. The environment is owned and managed by the Department's Federal Highway Administration (FHWA) and open for use as a collaborative environment for other operating administrations (OA) within the Department.

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[1] Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo M-03-22 dated September 26, 2003).

The site provides a virtual environment for communities of transportation professionals to collaborate (participate in discussions, document sharing, and other data sharing) as well as provide professional information about themselves (background, means of contact, etc.) for use by other members of the community.

TRCS exists on a Microsoft SharePoint 2010-based platform which includes collaboration features such as a centralized taxonomy structure for data powerful professional networking capabilities.

The environment features two separate types of communities: Open and Closed. Both types may be open to all members of the public including but not limited to transportation professionals, staff members from state government and other federal agencies, and members of the DOT workforce. Content and discussions in the Open communities are available for viewing by any member of the public and do not require individuals to create an account on the system before gaining read-access. In order to contribute information to an Open community, an individual must create an account on TRCS. Registration is open to all members of the public and the DOT community (employees and contractors). Registration allows users to take full advantage of the collaboration tools included in TRCS including posting of content, access to reference documentation, training materials, event notification. Registration also supports DOT's ability to ensure that Rules of Behavior are followed. Content and discussions maintained in "Closed" Communities are limited to those individuals who are registered members of TRCS and are approved by the site administrator of that community.

TRCS also leverages the My Site features of Microsoft SharePoint 2010 to promote professional networking among registered users.   A user's My Site is a personal site that provides a central location for each to manage and store documents, content, links, and contacts related to the environment. Additionally, an individual's My Site serves as a site wide point of contact for other registered TRCS users to access information about the user including but not limited to skills and interests. Only that information which the owner of the My Site has selected to post and make available to other members of the community may be viewed by registered users.

What PII TRCS Collects

Registration

To register for the site, users must submit a First Name, Last Name, E-Mail Address, and Organization. All four fields are mandatory. The e-mail address is required by the site so that users can manage their accounts. The organization is required so that site administrators can reference the information for internal reporting. The first and last names are required because the quality of virtual community-based collaboration is vastly improved when users are not anonymous.

User Support

Since users or potential users may encounter registration or account issues that prevent them from loggin in to the system, the system allows anonymous users to report issues to an administrative support team through the use of a Web form. The form captures First Name and an E-Mail Address among other free text and category fields. Both fields are captured in order to relay issue resolution information to the current or potential user.

My Site Profile

All registered users will have a My Site Profile. Users can choose whether or not to enter information to most fields and can choose whether or not to display those fields to all or limited groups of users. When a registered user creates or modifies any type of content, the system automatically tags the content with metadata including who created or modified the contentand the date of creation/modification. Once a profile is created, TRCS users may search for other individuals based on the content provided in the My Site Profiles. If

an individual identifies another user with whom they have an interest in communicating or following in the context of TRCS activities the user may tag that individual as a "colleague." Identifying an individual as a colleague allows users to follow that individual's contributions to the TRCS community but does not allow them to see information in the colleague's My Site Profile that has not otherwise been made available for public viewing. The establishment of a "colleague" relationship is one-way and does not result in the linkage of profiles or individuals.

Table 1 provides detailed information on which fields are mandatory, which fields are optional, or which fields the user choose to exclude from public view (hideable), and the reason they are collected within the My Site Profile.

Table 1: My Site Profile Field Details

Field	Requirement[1]	Description	Usage[2]
Account name	Mandatory Must Display	System-generated field incorporating the user's first and last name provided at initial registration. Users cannot edit this field.	System
Name	Mandatory Must Display	System-generated field incorporating the user's first and last name provided at initial registration. Users cannot edit this field.	System/ Collaboration
E-mail	Mandatory Hideable	Displays the user's e-mail address provided at initial registration. Users may edit this field once the initial registration process is complete. Individuals may choose shield this field from public view	System/ Collaboration
Organization	Mandatory Hideable	Displays the user's organization.	System/ Collaboration
Username	Optional	This proposed field will allow TRCS users to post content without revealing professional affiliations in cases where that would be inappropriate.	Collaboration
Telephone Number	Optional Hideable	Displays the user's phone number.	Collaboration
Job Title	Optional Hideable	Displays the user's professional job title.	Collaboration
About me	Optional Hideable	User may add professional networking information that might not otherwise be captured in the My Site Profile.	Collaboration
Ask Me About	Optional Hideable	User may define his or her professional expertise.	Collaboration
Last Colleague Added	Optional Hideable	This system-calculated field displays the last colleague that you have added.	Collaboration
Past projects	Optional Hideable	User defines his or her professional expertise.	Collaboration
Skills	Optional Hideable	User may define his or her professional expertise.	Collaboration

Field	Requirement[1]	Description	Usage[2]
Schools	Optional Hideable	User may define his or her education expertise.	Collaboration
Status Message	Optional Hideable	This small text field allows a user to add professional networking information that might not otherwise be captured in the My Site Profile.	Collaboration
Interests	Optional Hideable	User may define his or her professional interests.	Collaboration

NOTES:

1. **Requirement**
   - *Mandatory*: Information is required to provide information in order to obtain and maintain a valid user account.
   - *Optional*: Users choose whether *to* provide information.
   - *Must Display*: Information once *provided* will be made available to all users. The individual does not have the option to make this information inaccessible to other uses of the site.
   - *Hideable*: Users may choose to display this information to registered users.
2. **Usage**
   - *System*: This is a field *required* by TRCS to support user registration.
   - *Collaboration*: The My Site Profile may be used as a transportation professional resource locator within TRCS. Most fields help a community member identify his or her area of expertise and, more importantly, the area or areas about which others should contact him or her.

PII Usage

Why TRCS Collects PII

TRCS collects registration information in order to establish unique accounts for individuals who want to become users of the site. Since the site is a professional networking site for transportation professionals, My Site information is collected in order to connect users, share information, and facilitate collaboration My Site information on the site is available to other authenticated users. Support information is collected to coordinate with an individual who is having difficulty with the system without relying on the time and disorganization of different administrative e-mail accounts for different OAs.

How TRCS Uses PII

When a user creates or modifies content in the site, his or her username or first and last name is tagged to that content and will be visible to anyone accesses the site including DOT staff. TRCS supports My Sites so that transportation professionals can effectively share information and identify each other as having an interest in a particular topic area.

How TRCS Shares PII

By default, all content generated by a registered user is tagged with the individual's name (First and Last) provided upon initial registration and is made available to all users (registered and non-registered) who view the content. In the future, users will have the ability to display a username instead of a First and Last name in cases where community discussions might be controversial.

Information provided by registered users in their My Sites may only be viewed by other registered users if the user has elected to share. At any time, a user may decline to provide optional information, as defined above, or make that information unavailable to others.

During the registration process users may view a copy of the Rules of Behavior (Appendix A).

PII Retention, Maintenance, & Security

How TRCS Ensures Data Accuracy

Site users create and maintain their own user accounts and My Site information and the personal information is assumed to be accurate and no additional validation is conducted by the Department. Failure to provide accurate information may result in an individual being unable to take full advantage of TRCS features such as professional networking.

When a user finds inappropriate or offensive content posted by another user, that user can report the content to the appropriate site administrator by accessing the form on the Web site which can vary depending on the OA that controls the page that includes the content. Administrators may remove content containing inappropriate or offensive content and/or may remove user accounts for users who post such content.

How Long TRCS Retains PII

Users may request the removal of any or all of this information by accessing the form on the Web site.

The Department is working with the National Archives and Records Administration (NARA) to develop an appropriate records disposition schedule for content developed and maintained in TRCS. The Department proposes to retain records containing content for five years from the date of creation, but will retain all content until an appropriate disposition authority is granted. This PIA will be updated to reflect the final disposition schedule once it is approved.

In accordance with NARA *General Records Schedule 20 - Electronic Records*[2] (GRS 20), item 1c, registration information and user profile information maintained in the My Site portions of the website shall be deleted/destroyed when no longer needed for administrative, legal, audit or other operational purposes.

How TRCS Secures PII Information

TRCS is physically housed at the Integrated Communication Solutions (ICS) Inc. facility in Frederick, MD under a contract to DOT. The environment is a sub-system within RITA's General Support System (GSS) infrastructure environment. The RITA GSS is classified as a low risk system according to the National Institutes of Science and Technology (NIST) Federal Information Processing Standards (FIPS)-199 and is secured accordingly. The GSS has been granted a three year Authority to Operate (ATO) which expires on December 31, 2014.

Physical access to TRCS systems is limited to DOT-approved administrators and staff with a need to know through building key cards and room-access key pads. Personnel with physical access have all undergone and passed DOT security checks. In addition to physical access controls, the site has role-based access controls based on job function to limit access to the site. All DOT-approved staff with relevant access levels complete mandatory security and privacy training prior to being granted access to the site and are required to take annual refresher training thereafter.

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[2] http://www.archives.gov/records-mgmt/grs/grs20.html

How TRCS Provides Notice and Consent[3]

TRCS provides individuals participating in the communities a "layered" system of notices regarding the collection and use of PII by the Department. When a user initiates an account request, the user will an opportunity to review the sites Rules of Behavior and Privacy Statement (Appendix A).

Where TRCS provides links to Web sites external to the web environment managed by DOT, the user is presented with a pop-up window informing the user that his or she is leaving the site and that different privacy practices may apply. All sites that are expressly linked-to by DOT are reviewed to ensure that they are legitimate sites. However, DOT makes no claims as to their accuracy nor is DOT responsible for the privacy policies governing those sites. Links to external environments included in participant discussion threads or profiles are not reviewed by DOT; the exit pop-up window applies only to links that the site administrators maintain. Additional notice is provided through this PIA.

Participation in discussion forums, subscription to discussion boards or list alert services and the provision of user profile information to other participants is on an opt-in basis. Individuals may change their selections at any time, including withdrawing altogether from participation.

How TRCS Provides Redress

At any time, a user may ask questions, ask for a correction to information maintained by the system about them or report issues to the site support team and owner(s) through a Web-based form. Additionally, individuals may request that his or her account and any posted content be removed from the site at any time. Users may make these requests by accessing the support and contact features on the Web site.

Subject to the limitations of the Privacy Act, individuals may request access to information about themselves contained in a DOT system of records through DOT's Privacy Act/Freedom of Information Act (FOIA) procedures. As a matter of policy, DOT extends administrative Privacy Act protections to all individuals where systems of records maintain information on U.S. citizens, lawful permanent residents, and visitors. Individuals may request access to their own records that are maintained in a system of records in the possession or under the control of DOT by complying with DOT Privacy Act regulations, 49 CFR Part 10. Privacy Act requests for access to an individual's record must be in writing either handwritten or typed, may be mailed, faxed or e-mailed. DOT regulations require that the request include; include a description of the records sought, the requester's full name, current address, and date and place of birth. The request must be signed and either notarized or submitted under penalty of perjury. Additional information and guidance regarding DOT's FOIA/PA program may be found on the DOT website. Privacy Act requests may be addressed to:

> Claire W. Barrett
> 1200 New Jersey Ave., SE E31-312
> Washington, DC 20590
> privacy@dot.gov

TRCS Legal Authority for PII Information Collection

Under the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU; P.L. 109-59, August 10, 2005) Congress directed DOT's Research and Innovative Technology Administration to

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[3] According to the Privacy Act of 1974, 5 U.S.C. § 552(b), "No agency shall disclose any record which is contained in a system of records by any means of communication to any person, or to another agency, except pursuant to a written request by, or with the prior written consent of, the individual to whom the record pertains [subject to 12 exceptions listed under subsection (b)(1–12)]."

improve the ability of the transportation community to share information (see SAFETEA-LU, Section 5601(a) and 49 USC 111(f)(2).

TRCS System of Records Notice (SORN)

Records maintained in TRCS constitute a system of records subject to the Privacy Act because records may be retrieved by user by name.

The following SORN applies to this system: DOT/ALL 13, Internet/Intranet Activity and Access Records, Federal Register: November 7, 2002 (Volume 67, Number 88).[4]

Responsible Officials

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[4] www.dot.gov/privacy

Appendix A. Rules of Behavior for TRCS

The Transportation Research Collaborative Site (TRCS) is intended to foster collaboration and provides tools allowing discussion feedback and interaction among users. As users, you are free to share ideas and opinions as long as they conform to the collaborative site(s)'s purpose. In other words, you are expected to be honest and be respectful of others, not to insult, sell commercial or others services or make public accusations. While we do not control or censor the posting of messages, information or files, we do remove offensive material.

As a user of the collaborative site, you agree **NOT** to:

1. Falsely present yourself as a representative, employee, or official of a governmental entity by accidental or deliberate means including misleading or confusing statements in your postings.

2. Stray from the discussion topic, or make personal attacks on other website users and/or participants (personal attacks are defined as comments that reflect upon the person instead of their opinion), or make specific accusations regarding individual corporations or contracts.

3. Post or transmit any slanderous, defamatory, obscene, indecent, pornographic, profane, violent, abusive, insulting, threatening, offensive or harassing comments and/or information of any kind. We will not tolerate such postings, including without limitation any transmissions constituting or encouraging conduct that would constitute a criminal offense.

4. Post or re-post a message excessively, especially unsolicited advertisements, even if they are directly or indirectly related to the purpose of the site. Advertising of any kind, including non-profit organizations, is not permitted.

5. Add or post any material any copyrighted material to the site, without the written permission of the copyright owner, or engage in research misconduct.

As a user, you also:

6. Understand that these sites may experience failures or other service outages without notice.

7. Do not hold Department of Transportation (DOT) and any Operating Administrations (OAs) or the creators, operators, or related entities to the sites responsible or liable ("indemnify and hold harmless") for the inability to connect to or use the sites, or for any loss or corrupted data, or for any defamatory or offensive material(s) which you may encounter on or originating from the sites, or for the conduct, opinions, or publications of any user, or for any other problem whatsoever related to the use or existence of the sites.

8. Understand that DOT has no obligation to acknowledge, mediate or otherwise settle any disputes or differences in opinion that may arise between users.

9. Understand that DOT and its contractors have no obligation to monitor the discussion groups. However, they reserve the right at all times to disclose any information as necessary to satisfy any law and regulation and to edit, refuse to post, or to remove any information or links, in whole or in part, that are in violation of these terms and conditions or of applicable law.

10. Understand that for the purpose of contacting you and to foster collaboration, you will be asked to provide contact and professional networking information. This Information may be shared with members of this site. If you choose not to share this information, you may opt out of doing so.