Passport Application Management System (PAMS) PIA

1. Contact Information

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<th>A/GIS/IPS Director</th>
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<td>Bureau of Administration</td>
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2. System Information

Name of System: Passport Application Management System

Bureau: Consular Affairs

System Acronym: PAMS

iMatrix Asset ID Number: PAMS #120521 (MIS 724, PDITS 5227, PIERS 85, PLOTS 346, UMWS 4377)

Reason for Performing PIA:

☒ New System
☐ Significant modification to an existing system
☐ To update existing PIA for a triennial security reauthorization

Explanation of modification (if applicable):

3. General Information

(a) Does the system have a completed and submitted Security Categorization Form (SCF)?

☒ Yes
☐ No - Contact IRM/IA at IASolutionCenter@state.gov for assistance.

(b) What is the security Assessment and Authorization (A&A) status of the system?

The system is currently undergoing its initial Assessment and Authorization (A&A) in order to receive an Authorization To Operate (ATO) status. PAMS is expected to receive an ATO by Spring 2016.

(c) Describe the purpose of the system:

PAMS is a logical business grouping of all passport applications for Consular Affairs, which consists of Management Information System (MIS), Passport Data Information Transfer System (PDITS), Passport Information Electronic Records System (PIERS), Passport Lookout Tracking System (PLOTS), and User Manager Web Security (UMWS).
MIS
The Management Information System (MIS) is a web-based reporting tool that tracks predefined productivity statistics of U.S. passport agencies. It provides passport system management the ability to query the Travel Document Issuance System (TDIS) databases for information specific to any passport agency within the United States. This information includes weekly and monthly workloads, book inventory, agency hiring summaries, and statistics regarding agency staff.

PDITS
PDITS is a consolidation of database functionality and support under one design, development, and management structure. PDITS interfaces with TDIS and Online Passport Status Service Structured Query Language (OPSS SQL.) Prominent associations include being the recipient and repository of all issued passport data from TDIS.

PDITS' mandate is to continually ensure data quality and integrity in the passport databases, particularly with respect to the data imported from TDIS.

PIERS
The Passport Information Electronic Records System (PIERS) is a suite of web and desktop applications that provide query and management capabilities for passport records, Consular Reports of Birth Abroad (CRBA), Certificate of Witness to Marriage (CWM), Records of Death (ROD), Advance Finder (AF), Diplomatic and Official Tracking System (DOTS), Monitor, and Panama Canal Zone (PCZ) data. It operates on the Department of State’s OpenNet network. It provides direct access for OpenNet users at Agencies, Departments and Record Services and indirect access for external users through the Consular Consolidated Database (CCD).

The PIERS system provides users with both case-based and user-based views of information and support for electronic checking and reporting of work processes. Case-based views refer to the different types of data records that the PIERS system and database maintain. This includes passport information (all records of issued and expired passports, not issued applications, and destroyed/stolen/lost passports) and consular records of overseas births and deaths. User-based views refer to the PIERS systems ability to provide access to different data elements, record types, and system functions based on specific groups or system application roles assigned to individual users.

PLOTS
The Passport Lookout Tracking System (PLOTS) is a web enabled case management and image archive system used to manage and adjudicate Consular Lookout Automated Support System (CLASS) cases. The purpose of the PLOTS application is to provide CA domestic and post users with an efficient and reliable solution to the recording, managing, searching and process streamlining of CLASS cases.

UMWS
User Manager Web Security is a Web-based application used to manage user accounts. User accounts for the Consular Affairs personnel, who are authorized to access PRISM, MIS, PIERS,
PLOTS, and UMWS, are created and assigned the appropriate privileges. The user can then perform the tasks associated with their assigned privileges.

(d) Describe the personally identifiable information (PII) that the system collects, uses, maintains, or disseminates:

**PAMS**
- Names of Individuals
- Birthdates of Individuals
- SSNs or other Identifying Number
- Phone Number(s) of Individuals
- Business Addresses
- Personal Addresses
- Email Addresses of Individuals
- Images or Biometrics IDs

**MIS**
The Passport Services Directorate of the Department of State uses the web based Management Information System (MIS) to collect data and compile statistics related to the passport processing activities of passport agencies. Departmental users collect data, compile statistics and report on the following:
- passport production/ workload
- labor and staffing statistics
- passport employee productivity
- fees collected
- product inventory
- PLOTS case tracking
- PIERS privacy and user activity

MIS retrieves the data from a variety of departmental databases and permits the user to schedule and run reports based on system privileges. MIS does not contain or report PII of passport requesters but merely permits departmental users to aggregate the statistics regarding passports requested, issued/ denied, due dates and similar information.

**PDITS**
PDITS receives the following PII as a data transfer from TDIS. TDIS obtains the information from passport books and passport cards, applications for passport books and passport cards, and applications for additional visa pages, amendments, extensions, replacements, and/or renewals of passport books or cards. The information is not directly collected from the applicant.

- applicant's name
- date of birth
- place of birth
- gender
- social security number
- biometric IDs
- legal and family information
- mailing address
- email address

**PIERS**
PIERS collects the following PII elements:
- applicant's surname
- date of birth
- address
- telephone number
- social security number
- passport number
- driver’s license or other identifying number(s)
- education information
- financial transactions
- employer
- medical information

The passport applicant provides the information via web based PIERS. The PIERS data is input into TDIS and transferred via the Front End Processor (FEP), which communicates with PIERS to create new records and modify the records, and Data share, which feeds data to PIERS. The data includes an approved passport application from the Post repository server, which is in place for the sole purpose of supplying OPSS with passport status data.

**PLOTS**
PLOTS collects and maintains records related to applications for U.S. passports. Such information is entered into the passport after it is issued. Sources of the information are U.S. citizens applying for passports, other Department of State computer systems, passport specialists, and fraud prevention managers.

The record subjects in PLOTS are applicants for a U.S. passport who are suspected of having felony warrants or suspected of committing passport fraud, who owe debts to dependents or to the federal government, or who may be denied a passport or be issued only a restricted passport for certain other reasons permissible by statute.

Components of an individual's record (called a "case") in PLOTS are of two kinds. The first kind is the passport application and all supporting documentation related to it, including citizenship evidence, correspondence, reports of investigation, passport specialists' diary entries, court orders, passport revocation actions, and passport denial actions. (For a detailed description of PII in passport applications, please see the TDIS PIA.) The passport application and supporting
documents are imported into PLOTS electronically by way of separate Consular Affairs passport processing systems, not directly from the applicant.

The second kind of information in PLOTS about an individual is one or more "lookouts." Lookouts serve to alert passport specialists of possible fraud or other irregularities related to a person having the same or similar name and date of birth as that of the applicant. Lookouts are created by passport specialists at passport agencies/centers and at overseas posts in PLOTS which are then entered into the Consular Lookout and Support System (CLASS).

UMWS
UMWS collects last name, first name, login ID, office location, office phone number, office email address of federal employees who access applications in PAMS.

(e) What are the specific legal authorities and/or agreements that allow the information to be collected?

- 8 U.S.C. 1401-1504 (Title III of the Immigration and Nationality Act of 1952, as amended)
- 18 U.S.C. 911, 1001, 1541-1546 (Crimes and Criminal Procedure)
- 22 U.S.C. 211a-218, (Passports)
- 22 U.S.C 2651(a) (Organization of Department of State)
- Executive Order 11295, of August 5, 1966, 31 FR 10603 (Authority of the Secretary of State in granting and issuing U.S. passports)
- 8 U.S.C. 1104 (Powers and Duties of the Secretary of State)
- 8 U.S.C. 1185 (Travel Documentation of Aliens and Citizens)
- 22 C.F.R. Parts 50 and 51 (Nationality Procedures and Passports)
- 26 U.S.C. 6039E (Information Concerning Residence Status)

(f) Is the information searchable by a personal identifier (e.g., name or Social Security number)?

☒ Yes, provide:

SORN Name, Number, and Publication Date:
Passport Records – STATE-26, published March 24, 2015

☐ No, explain how the information is retrieved without a personal identifier.

(g) Does the existing SORN need to be amended to reflect the inclusion of this new or significantly modified system?

☐ Yes
☒ No

If yes, please notify the Privacy Division at Privacy@state.gov.
(h) Is there a records retention schedule submitted to or approved by the National Archives and Records Administration (NARA) for this system?

☑ Yes
☐ No

(If uncertain about this question, please contact the Department’s Records Officer at records@state.gov.)

If yes provide:

A-13-001-02 Passport Books: Recovered, Surrendered, Unclaimed or Found
Description: These passports books were issued to individuals who have returned them on their own initiative or at the request of the Department of State or other Government agency or have been found, recovered, and/or forwarded to Passport Services (PPT/TO/RS). They include Diplomatic or other official passports issued to military personnel who are either discharged, retired or deceased during the validity period of the passport; No Fee passports issued to Peace Corps volunteers; tourist passports; and all other passports.
Disposition: Destroy after receipt has been logged into PIERS database or successor electronic database. (ref. N1-059-96-5, item 2)
DispAuthNo: N1-059-04-2, item 2

A-13-001-16 Passport Lookout Master
Description: This on line information system assists Passport Services staff in determining those individuals to whom a passport should be issued or denied, identifies those individuals who have been denied passports, or those who are not entitled to the issuance of full validity passport and those whose existing files must be reviewed prior to issuance.
Disposition: Destroy when active agency use ceases. (ref. N1-059-96-5, item 16)
DispAuthNo: N1-059-04-2, item 16

4. Characterization of the Information
   (a) What entities below are the original sources of the information in the system? Please check all that apply.
       ☑ Members of the Public
       ☑ U.S. Government employees/Contractor employees
       ☐ Other (people who are not U.S. Citizens or legal permanent residents)

   (b) If the system contains Social Security Numbers (SSNs), is the collection necessary?
       ☑ Yes
       ☐ No

       If yes, under what authorization?
26 U.S.C. 6039E (Information Concerning Residence Status)
(c) How is the information collected?
The passport information is collected when an applicant fills out an application for a passport or passport book.

(d) Where is the information housed?
- ☑ Department-owned equipment
- ☐ FEDRAMP-certified cloud
- ☐ Other Federal agency equipment or cloud
- ☐ Other

If you did not select “Department-owned equipment,” please specify.

(e) What process is used to determine if the information is accurate?
The accuracy of the information is checked from sources including but not limited to, Social Security Administration, Law Enforcement, and Internal Revenue Service.

(f) Is the information current? If so, what steps or procedures are taken to ensure it remains current?
Passport applicants are responsible for providing current information on their passport applications. Information in PAMS is updated when an applicant submits a passport application. The information is only as current as the last update to the data specific to PAMS and PAMS components. Information housed in other system databases is collected via paper and online submissions.

(g) Does the system use information from commercial sources? Is the information publicly available?
The system does not get information from commercial sources. There is information publicly available, but it is not from commercial sources.

(h) Is notice provided to the individual prior to the collection of his or her information?
Yes, a passport applicant is advised of all the relevant privacy impact implications at the time the individual completes and signs the application. The applicant is notified of the following:
- their PII is being collected
- the purpose for which it is required
- the possible uses of the information
- the possibility that the data may be shared with other organizations/agencies
- how the data is protected from unauthorized/illicit disclosure
- potential consequences if the applicant declines to provide the data (e.g. that their passport application may be declined).

Completing, signing and submitting a passport application serves as legal consent from the individual to authorize the U.S. government to utilize their information for specific purposes, to
include adjudicating their passport application, and under certain circumstances to revoke the passport in accordance with U.S. law.

(i) **Do individuals have the opportunity to decline to provide the information or to consent to particular uses of the information?**

☐ Yes
☐ No

If yes, how do individuals grant consent?

At the time applicants complete the passport application, they are notified of their option to decline to provide the required information, and they are advised that to do so may cause their passport application to be denied. Passport applicants are also notified of the relevant privacy implications of providing their information, and how their information may be used and shared with other agencies. Passport applicants are not given the option to selectively consent to or deny specific uses of the information. The passport applicant grants complete consent upon signing the application. The applicant’s signature provides the authorization to the U.S. government to use and share the information.

If no, why are individuals not allowed to provide consent?

(j) **How did privacy concerns influence the determination of what information would be collected by the system?**

The Department of State understands the need for PII to be protected. Accordingly, the PII in PAMS is handled in accordance with federal privacy regulations regarding the collection, access, disclosure, and storage of PII. PAMS only collects the information necessary for the processing of Passport applications.

5. **Use of Information**

(a) **What is/are the intended use(s) for the information?**

PAMS is a logical business grouping of all passport applications for Consular Affairs, which consists of Management Information System (MIS), Passport Data Information Transfer System (PDITS), Passport Information Electronic Records System (PIERS), Passport Lookout Tracking System (PLOTS) and User Manager Web Security (UMWS).

**MIS**

Passport Agencies and the Department of State headquarters use the MIS system, a Web-based application, to collect data on:

- Passport production – the production data is submitted both weekly and monthly
- Labor & Staffing – the staffing data is submitted weekly

**PDITS**
PDITS receives PII as a data transfer from TDIS. PDITS acts as a data transfer mechanism between TDIS and Vital Passport Records Repository (VIPRR). This information is then written into a shared folder that DHS/CBP retrieves for archival purposes. TDIS obtains the information from passport books and passport cards, applications for passport books and passport cards, and applications for additional visa pages, amendments, extensions, replacements, and/or renewals of passport books or cards.

PIERS
A suite of web and desktop applications for managing passport records, Consular Reports of Birth Abroad (CRBA), Certificate of Witness to Marriage (CWM), Records of Death (ROD), Advance Finder (AF), Diplomatic and Official Tracking System (DOTS), Monitor, and Panama Canal Zone (PCZ) data. PIERS provides structured query capabilities to the data maintained within its environment. It provides direct access for OpenNet users at passport agencies, the Department, including Passport Services’ Office of Record Services, and indirect access for external users through the Consular Consolidated Database (CCD). PIERS provides its users with both case-based and user-based views of information, and support for electronic checking and reporting of work processes. Case-based views refer to the different types of data records that the PIERS system and database maintain. This includes passport information (all records of issued and expired passport, not issued applications, and destroyed/stolen/lost passports) and consular records of overseas births. User-based views refer to the PIERS system’s ability to provide access to different data elements, record types, and system functions based on specific groups or system application roles assigned to individual users.

PLOTS
PLOTS is used by the Bureau of Consular Affairs Directorate of Passport Services, other Consular Affairs offices, and the Bureau of Diplomatic Security. PLOTS allows these users to manage a passport lookout case. A PLOTS “lookout case” is a file documenting an incident that resulted or might result in the potential denial of a passport, or initiation of a criminal investigation. Such a case might be any of the following: fraud and fraud prevention, a child in the Children’s Passport Issuance Alert Program, or issues related to verifying the applicant’s citizenship or identity.

PLOTS streamlines the Passport Lookout tracking process and shortens the duration of investigations by eliminating the need to physically transfer files. This allows lookout cases to be efficiently processed and enables users to:

- Create and modify new cases and Lookout records
- Search, retrieve, and manage existing cases and Lookout records
- Search, add, and delete Lookout records to and from the Consular Lookout and Support System (CLASS)
- Refer cases electronically to Diplomatic Security (DS)

UMWS
User Manager Web Security (UMWS) allows users to be assigned privileges to access Passport systems to perform their tasks. User accounts for Bureau of Consular Affairs personnel who are
authorized to access the Passport Information Electronic Records System (PIERS), Management Information System (MIS), Passport Records Imaging System Management (PRISM), and Passport Lookout Tracking System (PLOTS) are created and assigned the appropriate privileges in UMWS. The user then can perform the tasks associated with the privileges.

(b) Is the use of the information relevant to the purpose for which the system was designed or for which it is being designed?
Yes, the information relates to passport issues and management of the passport application process.

(c) Does the system analyze the information stored in it?
☐ Yes
☒ No
If yes:
(1) What types of methods are used to analyze the information?
Not applicable.

(2) Does the analysis result in new information?
Not applicable.

(3) Will the new information be placed in the individual’s record?
☐ Yes
☐ No
Not applicable.

(4) With the new information, will the Department be able to make new determinations about the individual that would not have been possible without it?
☐ Yes
☐ No
Not applicable.

6. Sharing of Information
(a) With whom will the information be shared internally and/or externally? Please identify the recipients of the information.
The information is shared internally within the Bureau of Consular Affairs to include Passport Agencies and the Passport Services Directorate, and with the Bureau of Diplomatic Security. Information is not directly shared with any external organizations.

(b) What information will be shared?
Information about Passport applicants, status of applications, all records of issued and expired passports, not issued applications, and destroyed/stolen/lost passports.

(c) What is the purpose for sharing the information?
The information is shared to assist the Department of State in managing and tracking the passport application process.

(d) The information to be shared is transmitted or disclosed by what methods?
The information is shared by direct interfaces with other Consular systems, secure email and U.S. mail.

(e) What safeguards are in place for each internal or external sharing arrangement?
Internal recipients, within the Department of State, must comply with U.S. government requirements for the protection and use of PII. These safeguards include but are not limited to security training and internal Department policy for the handling and transmission of “Sensitive but Unclassified” information. In addition, all Department users are required to attend annual privacy and security awareness training to reinforce safe handling practices.

(f) What privacy concerns were identified regarding the sharing of the information? How were these concerns addressed?
Privacy concerns regarding the sharing of information focus on two primary sources of risk: 1) accidental disclosure of information to non-authorized parties, or 2) deliberate disclosure/theft of information regardless whether the motivation was monetary, personal or other. Accidental disclosure is usually due to inadequate document control (hard copy or electronic), inadequate PII and security training, or insufficient knowledge of roles, authorization and need-to-know policies. In addition, social engineering, phishing, and firewall breaches can also represent a risk of accidental disclosure of information.

The Department of State mitigates these risks by enforcing rules and requirements regarding:
- Frequent, regular security training for all personnel regarding information security, including the safe handling and storage of PII, “Sensitive But Unclassified,” and all higher levels of classification;
- Strict access control based on roles and responsibilities, authorization and need-to-know;
- Implementation of management, operational, and technical controls regarding separation of duties, least privilege, auditing, and personnel account management.

7. Redress and Notification
(a) What procedures allow individuals to gain access to their information?
The system contains Privacy Act-covered records; therefore, notification and redress are the right of record subjects. Procedures for notification and redress are published in the System of Records Notice (SORN) Passport Records - STATE-26, and in rules published within 22 CFR Part 171.

(b) Are procedures in place to allow an individual to correct inaccurate or erroneous information?
☒ Yes
☐ No

If yes, explain the procedures.
Individuals who wish to obtain their records or have them amended must submit a written request to the U.S. Department of State, Office of Law Enforcement Liaison Division (CA/PPT/S/L/LE) at the address cited in the Passport Records SORN, STATE-26, posted on the Department of State FOIA website.

If no, explain why not.

(c) By what means are individuals notified of the procedures to correct their information?
Individuals who wish to have their records amended can find instructions, submission requirements, and the address of the U.S. Department of State, Office of Law Enforcement Liaison Division (CA/PPT/S/L/LE) in the Passport Records SORN, STATE-26, posted on the Department of State’s FOIA website www.foia.state.gov.

8. Security Controls
(a) How is the information in the system secured?
The PAMS system is secured within the Department of State intranet where risk factors are mitigated through the use of multiple layers of security controls including management security, auditing, firewalls, and physical security.

(b) Describe the procedures established to limit access to only those individuals who have an “official” need to access the information in their work capacity.
As a matter of policy, the Department of State Chief Information Officer and Information System Security Officer require certain fundamental procedures for all systems. Potential users are screened and assigned privileges based on their roles, responsibilities and the need-to-know. Specific privileges for a given user are only granted after careful consideration of the user role. There are five types of PAMS user roles: Administrator, Alternate Administrator, Security, Power Users, and View Only. All access is enforced by user profiles according to the principle of least privilege and the concept of separation of duties.

(c) What monitoring, recording, and auditing safeguards are in place to prevent the misuse of the information?
Various technical controls are in place to deter, detect, and defend against the misuse of personally identifiable information. Monitoring occurs from the moment an authorized user attempts to authenticate to the network. From that point on any changes (authorized or not) that occur to data are recorded. If an issue were to arise, administrators of the system would review (audit) the logs that were collected from the time a user logged on until the time they signed off. This multilayered approach to security controls greatly reduces the risk that PII will be misused.

(d) Explain the privacy training provided to authorized users of the system.
In accordance with Department of State computer security policies, PAMS users are required to complete the Cyber Security Awareness Training and the PII Training at least once a year. The Department’s standard “Rules of Behavior” regarding the use of any computer system and the data it contains note that users have an obligation to protect PII through appropriate safeguards to
ensure security, privacy and integrity. The following list details some, but not all, of the numerous requirements covered under the “Rules of Behavior” related to PII.

Users are prohibited from the following activities:

- Browsing PII records without authorization or for purposes other than those directly connected with their official work-related responsibilities;
- Disclosing PII to others, including other authorized uses, unless there is a need to do so in the performance of official duties;
- Removing PII from the workplace unless it is for an approved work-related purpose;
- Storing PII in shared electronic folders or shared network files;
- Storing PII on any computing device not owned by the government;
- Altering or deleting PII unless the action is part of their official duties and responsibilities.

Users are also required to take the following actions:

- Protect access to all media on which PII is processed;
- Store hard-copy PII in locked containers or rooms;
- Safeguard any PII (electronic or hard-copy) which is removed from the workplace in the performance of official duties;
- Protect against eavesdropping on telephones or other conversation when PII is discussed.

(e) Are any security controls such as encryption, strong authentication procedures, or other controls in place to make the information unusable to unauthorized users?

☒ Yes
☐ No

If yes, please explain.

Bureau of Diplomatic Security (DS) guidelines are implemented for operating systems, web servers, and databases to prevent unauthorized disclosure of information and detect changes to information during transmission.

Systems use Transmission Control Protocol/Internet Protocol TCP/IP to assist with its data transport across the network. The TCP/IP protocol suite consists of multiple layers of protocols that help ensure the integrity of data transmission, including hand-shaking, header checks, and re-sending of data if necessary. Additionally, systems employ the use of Hash message authentication codes to sign packets verifying that the information received by the system from the Internet is exactly the same as the information sent. Also, The Systems Integrity Division is responsible for developing policies regarding digital certificates (including web-based Secure Socket Layer (SSL) certificates), and all cryptographic keys.
The Information Integrity Branch (IIB) is composed of four operational elements:

- Antivirus
- Mainframe Security
- The Public Key Infrastructure (PKI) and Biometrics
- E-Authentication

The Information Integrity Branch provides administrative life-cycle security protection for the Department of State’s information technology systems and information resources. IIB’s goal is to ensure that information processed and stored is safe from unauthorized access, disclosure, disruption, or denial of service.

All systems must comply with all guidelines published by Systems Integrity Division, in addition to all security configuration guides published by Diplomatic security. Adherence to these guides is verified during the system’s A&A process.

1 FAM 275.2-3(B) Information Integrity Branch (IRM/OPS/ITI/SI/IIB)

(f) How were the security measures above influenced by the type of information collected?

The Department of State has long been concerned with the protection of individuals’ personal information in accordance with U.S. government policies. Passport information and the PII contained therein constitute the substantive portion of the information contained in PAMS. Accordingly, the Department of State has implemented the rigorous security measures outlined above to ensure that individuals’ PII is appropriately protected.

9. Data Access

(a) Who has access to data in the system?

The following personnel have access to the system: System/Web Administrators, Application Administrators and Database Administrators

(b) How is access to data in the system determined?

An individual’s job function determines what data can be accessed.

(c) Are procedures, controls or responsibilities regarding access to data in the system documented?

☒ Yes
☐ No

CA/CST adheres to a formal, documented audit and accountability policy that addresses purpose, scope, roles, and responsibilities. In addition, there are documented procedures to facilitate the implementation of the policy and the audit and accountability controls.

(d) Will all users have access to all data in the system or will user access be restricted? Please explain.
There are three types of PAMS user roles: System/Web Administrators, Application Administrators and Database Administrators. Users will have access based on the roles/job functions.

- **The System/Web Administrator** - must first receive their Department of State badge and email account. Once received, the System Service and Operations Project Manager complete the CA/CST System Administrator Account Request Form. The Project Manager signs the form authorizing the account to be established and activated, and a current System Administrator creates the account.

- **Application Administrators** - The System Administrators and PAMS Application Admin users are responsible for establishing, activating, modifying, reviewing, disabling, and removing Application Admin accounts in the PAMS OpenNet database server.

- **Database Administrators** - Database Administrator (DBA) access is controlled by the Data Integrated Services (IS) team. PAMS DBAs are authenticated using Windows operating system authentication only. The IS Government Technical Monitor is responsible for reviewing and approving accounts. The current DBA activates/establishes an account when he/she adds the new user to the Windows security group. Access is disabled when no longer required; accounts are reviewed every 60 days to determine when access should no longer be granted.

**What controls are in place to prevent the misuse (i.e. unauthorized browsing) of data by users having access to the data?**

In addition to the restrictions mentioned above in section 9(d), all accounts are subject to automatic auditing. Audit logs are reviewed at the Application, Database, and System level as follows:

- **Application level**: PAMS administrators review the application level audit logs as necessary and take the appropriate action if suspicious activity or suspected violations are identified.

- **Database level**: SSO reviews the SQL logs for indications of inappropriate or unusual activity on the PAMS database, investigates suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions.

- **System level**: SSO reviews the Operating System OS logs for indications of inappropriate or unusual activity on the PAMS system, investigates suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions.