

**Federal Communications Commission**  
*Office of the Managing Director*



**Privacy Impact Assessment<sup>1</sup> (PIA) for the  
Reasonable Accommodation Requests**

**August 18, 2009**

**FCC Bureau/Office:** Office of Workplace Diversity (OWD)

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<sup>1</sup> This questionnaire is used to analyze the impacts on the privacy and security of the personally identifiable information (PII) that is being maintained in these records and files.

The *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, requires Federal agencies to take special measures to protect personal information about individuals when the agencies collect, maintain, and use such personal information.

Having established through the **Privacy Threshold Analysis (PTA)** that this information system contains information about individuals, *e.g.*, personally identifiable information (PII), it is important that when the FCC makes changes to such an information system, the FCC then analyzes:

- (a) What changes are being made to the information that the system presently collects and maintains; and/or
- (b) What new information will be collected and maintained to determine the continuing impact(s) on the privacy of the individuals.

The Privacy Impact Assessment template's purpose is to help the bureau/office to evaluate the changes in the information in the system and to make the appropriate determination(s) about how to treat this information, as required by the Privacy Act's regulations.

### Section 1.0 Information System's Contents:

#### 1.1 Status of the Information System:

- New information system—Implementation date:
- Revised or upgraded information system—Revision or upgrade date: June 2009

If this system is being revised—what will be done with the newly derived information:

- Placed in existing information system—Implementation Date: June 2009
- Placed in new auxiliary/ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

The Office of Workplace Diversity (OWD) is making various minor revisions to the Reasonable Accommodations Requests information system that is covered by the system of records notice (SORN) FCC/OWD-1, "Reasonable Accommodations Requests" SORN. OWD has upgraded parts of this information system and added a routine use, "breach notification," as required by OMB Memorandum M-07-16 (May 22, 2007).

#### 1.2 Has a Privacy Threshold Analysis (PTA) been done?

- Yes  
Date:
- No

If a Privacy Threshold Analysis has not been done, please explain why not:

The Reasonable Accommodations Request information system, which is covered by the system of records notice (SORN), FCC/OWD-1, "Reasonable Accommodations Requests" SORN, pre-dates the requirements in OMB Memorandum M-03-18 (September 22, 2003).

This SORN, which was previously titled, FCC/OWD-1, "Reasonable Accommodation Requests under the Rehabilitation Act of 1973," was published in the *Federal Register* on April 5, 2006, see 71 FR 17234, 17268).

If the Privacy Threshold Analysis (PTA) has been completed, please skip to Question 1.15

- 1.3 Has this information system, which contains information about individuals, *e.g.*, personally identifiable information (PII), existed under another name, *e.g.*, has the name been changed or modified?

Yes  
 No

If yes, please explain your response:

As noted in Question 1.2, the Reasonable Accommodation Requests information system was previously titled, Reasonable Accommodations Requests under the Rehabilitation Act of 1973.

- 1.4 Has this information system undergone a “substantive change” in the system’s format or operating system?

Yes  
 No

If yes, please explain your response:

The staff in the Office of Work Place Diversity (OWD) has made only minor updates to the operating system, *etc.* for the Reasonable Accommodation Requests information system.

If there have been no such changes, please skip to Question 1.6.

- 1.5 Has the medium in which the information system stores the records or data in the system changed from paper files to electronic medium (computer database); or from one electronic information system to another, *i.e.*, from one database, operating system, or software program, *etc.*?

Yes  
 No

If yes, please explain your response:

- 1.6 Has this information system operated as part of another information system or was it linked to another information system:

Yes  
 No

If yes, please explain your response:

The Reasonable Accommodation Requests information system is a "stand alone" information system. It has no electronic links to other FCC or non-FCC information systems.

If the information system is not part of, nor linked to another information system, please skip to Question 1.8

- 1.7 If so, was it operated by another bureau/office or transferred from another Federal agency to the FCC?

Yes  
 No

Please explain your response:

1.8 What information is the system collecting, analyzing, managing, storing, transferring, *etc.*:

**Information about FCC Employees:**

- No FCC employee information
- FCC employee's name:
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data:
- Credit card number(s)
- Driver's license
- Bank account(s)
- FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: Applicants (including full and part-time FCC employees, student interns, co-op students, and temporary hires), telephone number, organizational unit (bureau/office), room/workstation number, accommodation request, reason for accommodation request, impairment, evidence of impairment, major life activity(s), contact date, request date,

authorization issue date, job performance issue(s), duration of impairment, property pass privileges, if applicable, (authorization) status, and log number.

**Information about FCC Contractors:**

- No FCC contractor information
- Contractor's name
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- SSN
- U.S. Citizenship
- Non-U.S. Citizenship
- Race/Ethnicity
- Gender
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

**Information about FCC Volunteers, Visitors, Customers, and other Individuals:**

- Not applicable
- Individual's name:
- Other name(s) used, *i.e.*, maiden name, *etc.*

- FCC badge number (employee ID)
- SSN:
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age:
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

**Information about Business Customers and others (usually not considered “personal information”):**

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Business/office address

- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Credit card number(s)
- Bank account(s)
- Other information:

1.9 What are the sources for the information that you are collecting:

- Personal information from FCC employees: current FCC employees (including full and part-time Commission employees, student interns, co-op students, and temporary hires).
- Personal information from FCC contractors:
- Personal information from non-FCC individuals and/or households:
- Non-personal information from businesses and other for-profit entities:
- Non-personal information from institutions and other non-profit entities:
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources:

1.10 Will the information system obtain, use, store, analyze, *etc.* information about individuals *e.g.*, personally identifiable information (PII), from other information systems, including both FCC and non-FCC information systems?

- Yes
- No

Please explain your response:

The Reasonable Accommodations Requests information system is a "stand alone" information system. It has no electronic links to any other FCC or non-FCC information systems.

If the information system does not use any PII from other information systems, including both FCC and non-FCC information systems, please skip to Question 1.15.

1.11 If the information system uses information about individuals from other information systems, what information will be used?

- FCC information system and information system name(s):
- Non-FCC information system and information system name(s):
- FCC employee's name:
- (non-FCC employee) individual's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)

- Other Federal Government employee ID information, i.e., badge number, *etc.*
- SSN:
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information:
  - Home address
  - Home address history
  - Home telephone number(s)
  - Personal cell phone number(s)
  - Personal fax number(s)
  - Personal e-mail address(es)
  - Emergency contact data
  - Credit card number(s)
  - Driver's license
  - Bank account(s)
  - Non-FCC personal employment records
  - Non-FCC government badge number (employee ID)
  - Law enforcement data
  - Military records
  - National security data
  - Communications protected by legal privileges
  - Financial history
  - Foreign countries visited
  - Background investigation history
  - Digital signature
  - Other information:

**Information about Business Customers and others (usually not considered “personal information”):**

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations

- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information:

1.12 Will this information system derive new information, records, or data, or create previously unavailable information, records, or data, through aggregation or consolidation from the information that will now be collected via this link to the other system, including information, records, or data, that is being shared or transferred from the other information system(s)?

- Yes
- No

Please explain your response:

1.13 Can the information, whether it is: (a) in the information system, (b) in a linked information system, and/or (c) transferred from another system, be retrieved by a name or a “unique identifier” linked to an individual, *e.g.*, SSN, name, home telephone number, fingerprint, voice print, *etc.*?

- Yes
- No

Please explain your response:

1.14 Will the new information include personal information about individuals, *e.g.*, personally identifiable information (PII), be included in the individual’s records, or be used to make a determination about an individual?

- Yes
- No

Please explain your response:

- 1.15 Under the *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, Federal agencies are required to have a System of Records Notice (SORN) for an information system like this one, which contains information about individuals, *e.g.*, “personally identifiable information” (PII).

A System of Records Notice (SORN) is a description of how the information system will collect, maintain, store, and use the personally identifiable information (PII).

Is there a SORN that already covers this PII in this information system?

- Yes  
 No

If yes, what is this System of Records Notice (SORN): This system of records notice, FCC/OMD-18, "Telephone Call Detail," was published in the *Federal Register* on April 5, 2006. (As noted in Question 1.2, the SORN has been renamed, FCC/OWD-1, "Reasonable Accommodation Requests.")

Please provide the citation that was published in the *Federal Register* for the SORN: 71 FR 17234, 17268.

If a SORN already covers this PII, please skip to **Section 2.0 System of Records Notice (SORN) Update** to address any changes to this SORN.

If a system of records notice (SORN) does not presently cover the information about individuals in this system, then it is necessary to determine whether a new FCC system of records notice must be created for the information.

- 1.16 If this information system is not covered by a system of records notice (SORN), does the information system exist by itself, or does it now, or did it previously exist as a component or subset of another SORN?

- Yes  
 No

If yes, please explain what has occurred:

What is the System of Records Notice (SORN) of which it is currently or previously a component or subset:

Please also provide the citation that was published in the *Federal Register* for the SORN:

- 1.17 What are the purposes or functions that make it necessary to create a new a system of records notice (SORN) for this information system, *e.g.*, why is the information being collected?

- 1.18 Where is this information for the system of records notice (SORN) located?

1.19 Is the use of the information both relevant and necessary to the purposes for which the information system is designed, *e.g.*, is the SORN only collecting and using information for the specific purposes for which the SORN was designed so that there is no “extraneous” information included in the database(s) or paper files?

- Yes  
 No

Please explain your response:

If the use of this information is both relevant and necessary to the processes for this information system is designed, please skip to Question 1.21.

1.20 If not, why or for what reasons is the information being collected?

1.21 Is the information covered under a Security Classification as determined by the FCC Security Officer?

- Yes  
 No

Please explain your response:

1.22 What is the legal authority that authorizes the development of the information system and the information/data collection?

1.23 In what instances would the information system’s administrator/manager/developer permit disclosure to those groups outside the FCC for whom the information was not initially intended.

Such disclosures, which are referred to as “Routine Uses,”<sup>2</sup> are those instances that permit the FCC to disclose information from a SORN to specific “third parties.” These disclosures may be for the following reasons:

(check all that are applicable)

- Adjudication and litigation:  
 Committee communications and reporting:  
 Compliance with welfare reform requirements:  
 Congressional inquiries:  
 Emergency response by medical personnel and law enforcement officials:  
 Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:

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<sup>2</sup> Information about individuals in a system of records may routinely be disclosed for the following conditions, *e.g.*, “routine uses”; however, in each of these routine uses that are checked, the FCC will determine whether disclosure of the information, *i.e.*, records, files, documents, and data, *etc.*, is compatible with the purpose(s) for which the information has been collected

- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Information Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations (NTEU):
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA, *etc.*:
- Breach of Federal data:
- Others “third party” disclosures:

1.24 Will the information be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

1.25 What are the policies for the maintenance and secure storage of the information?

1.26 How is information in this system retrieved?

1.27 What policies and/or guidelines are in place on how long the bureau/office will retain the information?

1.28 Once the information is obsolete or out-of-date, what policies and procedures have the system’s managers/owners established for the destruction/purging of the data?

1.29 Have the records retention and disposition schedule(s) been issued or approved by the National Archives and Records Administration (NARA)?

- Yes
- No

Please explain your response:

If a NARA records retention and disposition schedule has been approved for this System of Records Notice (SORN), please skip to **Section 2.0 System of Records Notice (SORN) Update:**

1.30 If there is no NARA approved records retention and disposal schedule, has there been any coordination with the Performance Evaluation and Records Management Branch (PERM) or the Records Officer?

- Yes
- No

Please explain your response:

If this is a new System of Records Notice (SORN), please skip to **Section 3.0 Development, Management, and Deployment and/or Sharing of the Information:**

**Section 2.0 System of Records Notice (SORN) Update:**

If a System of Records Notice (SORN) currently covers the information, please provide information to update and/or revise the SORN:

2.1 Have there been any changes to the Security Classification for the information covered by the system of records notice (SORN) from what was originally determined by the FCC Security Officer?

- Yes
- No

Please explain your response:

The FCC's Security Operations Center (SOC) has not assigned a security classification to the Reasonable Accommodations Requests information system and to the PII that it collects, uses, and maintains, which is covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN.

2.2 Have there been any changes to the location of the information covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

The information, including the PII that is covered by FCC/OWD-1, "Reasonable Accommodations Requests" SORN, is located in the Office of Workplace Diversity (OWD), Federal Communications Commission (FCC), 445 12<sup>th</sup> Street, S.W., Washington, DC 20554.

2.3 Have there been any changes to the categories of individuals covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

The categories of individuals that are covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, include those FCC employees (including full-time and part-time Commission employees, temporary hires, interns, and co-op students, *etc.*) who have requested reasonable accommodations in their office or workstation.

2.4 Have there been any changes to the categories of records, *e.g.*, types of information (or records) that the system of records notice (SORN) collects, maintains, and uses?

- Yes  
 No

Please explain your response:

The categories of records, including the PII that is covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, consist of the FCC employees (applicants) database (full and part-time Commission employees, temporary hires, interns, and co-op students, *etc.*), the FCC employee's first and last name, organizational unit (bureau/office), telephone number, organizational unit (bureau/office), room/workstation number, accommodation request, reason for accommodation request, impairment, evidence of impairment, major life activity(s), contact date, request date, authorization issue date, job performance issue(s), duration of impairment, property pass privileges, if applicable, (authorization) status, and log number.

2.5 Have there been any changes to the legal authority under which the FCC collects and maintains the information covered by the system of records notice (SORN)?

- Yes  
 No

Please explain your response:

The legal authorities for maintenance of the personally identifiable information (PII) covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, are Executive Order 13164, *Establishing Procedures to Facilitate the Provision of Reasonable Accommodation*; Equal Employment Opportunity Commission (EEOC) publication, *Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the Americans with Disabilities Act*; 29 C.F.R. Part 1615, Rehabilitation Act of 1973; 29 U.S.C. 12101 *et seq.*; 29 C.F.R. Section 1630.

2.6 Have there been any changes to the purposes for collecting, maintaining, and using the information covered by the system of records notice (SORN)?

- Yes  
 No

Please explain your response:

The purposes for collecting maintaining, and using the Reasonable Accommodations Requests information, including the personally identifiable information (PII) that is covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, are:

- (1) To provide a method by which the FCC can identify each Commission employee who has requested "reasonable accommodations" in his/her office, work station, or to use other Commission facilities; and
- (2) To maintain information on the disposition of each individual's request for "reasonable accommodation."

2.7 Have there been any changes to the “Routine Uses”<sup>3</sup> under which disclosures are permitted to “third parties” as noted in the system of records notice (SORN)?

- Yes
- No

Please check all Routine Uses that apply and provide any explanation as required:

- Adjudication and litigation:
- Committee communications and reporting:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA:
- Breach of Federal data: OMB Memorandum M-07-16 (May 22, 2007).
- Others Routine Use disclosures not listed above:

2.8 Have there been any changes as to whether the FCC will permit the information covered by the system of records notice (SORN) can be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

Information in the Reasonable Accommodation Requests information system, including the PII covered by FCC/OWD-1, “Reasonable Accommodation Requests” SORN, is not disclosed to any consumer reporting agencies.

2.9 Have there been any changes to the policies and/or guidelines for the storage and maintenance of the information covered by this system of records notice (SORN)?

- Yes
- No

Please explain your response:

The information in the Reasonable Accommodations Requests information system, including the PII that is covered by FCC/OWD-1, “Reasonable Accommodation Requests” SORN, consists of:

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<sup>3</sup> Information about individuals in a system of records may routinely be disclosed for the following conditions, *e.g.*, “routine uses”; however, in each of these routine uses that are checked, the FCC will determine whether disclosure of the information, *i.e.*, records, files, documents, and data, *etc.*, is compatible with the purpose(s) for which the information has been collected

- (1) Paper documents and files, *e.g.*, EEOC Form 557, FCC "Reasonable Accommodation Request Questionnaire" attachment, and all accompanying documentation, *etc.*, that substantiates an applicant's request for "reasonable accommodations," paper copies of e-mail correspondence, notes, and records, *etc.*, which are stored in the OWD file cabinets; and
- (2) Electronic version (or a copy of the information obtained from these paper documents and files) of EEOC Form 557, FCC "Reasonable Accommodation Request Questionnaire" attachment, and all accompanying documentation, *etc.*, that substantiates an applicant's request for "reasonable accommodations," e-mail correspondence, the "Status of ECO Complaints and Accommodations" monthly report charts, and other documents and records, which are stored in the FCC's computer network databases.

2.10 Have there been any changes to how the information covered by the system of records notice (SORN) is retrieved or otherwise accessed?

- Yes
- No

Please explain your response:

Information in the Reasonable Accommodations Requests information system's paper document files and records is retrieved by searching by the individual's last name or the (corresponding) accommodation identification number. Information in the electronic records and files can be retrieved by the individual's last name, accommodation identification number, office or workstation address, bureau/office, and reasonable accommodations request date.

2.11 Have there been any changes to the safeguards that the system manager has in place to protect unauthorized access to the information covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

Access to the information, including the electronic files, records, and data, and the paper documents and files in the Reasonable Accommodations Requests information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, is restricted to authorized OWD supervisors and staff. Other FCC employees and contractors may have access on a "need-to-know" basis as dictated by their job duties and responsibilities.

The information (electronic records and data) in the FCC's computer network databases is secured through controlled access and passwords restricted to the administrative staff in the Information Technology Center (ITC) and the OWD supervisors and staff. The information that is resident on the FCC's network servers is backed-up daily to magnetic media. Back-up tapes are stored on-site and at an off-site storage location.

The paper documents and files are stored in locked file cabinets in the OWD office suite.

Please note that you must also provide an update of the current protections, safeguard, and other security measures that are in place in this SORN in **Section 5.0 Safety and Security Requirements:**

2.12 Have there been any changes to the records retention and disposition schedule for the information covered by the system of records notice (SORN)? If so, has the system manager worked with the Performance Evaluation and Records Management (PERM) staff to insure that this revised schedule been approved by the National Archives and Records Administration (NARA)?

- Yes
- No

Please explain your response:

The OWD maintains the information, including the paper documents, records, and files and the electronic records, files, and data, which are covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, in accordance with the General Records Schedule 1, item 24, as follows:

- (1) The information in the general files is maintained for three years after separation from the Commission or when no longer needed for references whichever is later.
- (2) Employee case files are destroyed three years after employee's separation from the agency or all appeals are concluded or whichever is later.
- (3) Supplemental files are destroyed three years after end of fiscal year in which accommodation is decided or all appeals are concluded, whichever is later.

Records and data created, received, or maintained for purposes of tracking agency compliance are deleted/destroyed 3 years after the compliance report is filed or when no longer needed for reference.

Paper documents disposition is by shredding, and electronic records and data are destroyed by physical destruction (electronic storage media) or by electronic erasure.

### Section 3.0 Development, Management, and Deployment and/or Sharing of the Information:

3.1 Who will develop the information system(s) covered by this system of records notice (SORN)?

- Developed wholly by FCC staff employees:
- Developed wholly by FCC contractors:
- Developed jointly by FCC employees and contractors:
- Developed offsite primarily by non-FCC staff:
- COTS (commercial-off-the-shelf-software) package:
- Other development, management, and deployment/sharing information arrangements:

3.2 Where will the information system be hosted?

- FCC Headquarters
- Gettysburg
- San Diego
- Colorado
- New York
- Columbia Lab
- Chicago
- Other information:

- 3.3 Who will be the primary manager(s) of the information system who will be responsible for assuring access to, proper use of, and protecting the security and integrity of the information? (Check all that apply and provide a brief explanation)
- FCC staff in this bureau/office exclusively: The OWD supervisory staff has responsibility for access and proper use of the information in the Reasonable Accommodations Requests information system.
  - FCC staff in other bureaus/offices:
  - Information system administrator/Information system developers:
  - Contractors:
  - Other information system developers, *etc*:
- 3.4 What are the FCC's policies and procedures that the information system administrators and managers use to determine who gets access to the information in the system's files and/or database(s)?
- Access to the data that are stored on the FCC's network is restricted to the OWD staff and to other FCC employees and contractors working at the FCC on a "need to know" basis as dictated by their job duties and responsibilities.
- 3.5 How much access will users have to data in the information system(s)?
- Access to all data:
  - Restricted access to data, as determined by the information system manager, administrator, and/or developer: OWD employees and contractors may be granted access on a "need-to-know" basis as dictated by their job duties and responsibilities.
  - Other access policy:
- 3.6 Based on the Commission policies and procedures, which user group(s) may have access to the information at the FCC: (Check all that apply and provide a brief explanation)
- Information system managers: OWD supervisory staff.
  - Information system administrators: OWD staff, including both FCC employees and contractors, who manage the IT systems that hold and process the PII data.
  - Information system developers:
  - FCC staff in this bureau/office: OWD employees are granted access on a "need to know" basis.
  - FCC staff in other bureaus/offices:
  - FCC staff in other bureaus/offices in FCC field offices:
  - Contractors: Contractors working at the FCC are granted access on a "need to know" basis.
  - Other Federal agencies:
  - State and/or local agencies:
  - Businesses, institutions, and other groups:
  - International agencies:
  - Individuals/general public:
  - Other groups:

- 3.7 If contractors are part of the staff in the FCC who collect, maintain, and access the information, does the ITC supervisory staff ensure that contractors adhere fully to the Privacy Act provisions, as required under subsection (m) of the Privacy Act, as amended, 5 U.S.C. 552a(m)?

Yes  
 No

Please explain your response:

The ITC supervisory staff provides periodic privacy training to the IT contractors who handle the PII contained in the Reasonable Accommodations Requests information system.

- 3.8 Do any Section M contract(s) associated with the information system covered by this system of records notice (SORN) include the required FAR clauses (FAR 52.224-1 and 52.224-2)?

Yes  
 No

Please explain your response:

The OGC staff has reviewed and signed-off on the Section M contracts for the IT contractors who manage the Reasonable Accommodations Requests information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodations Requests" SORN, as required by Sections 52.224-1 and 52.224-2 of the Federal Acquisition Regulations (FAR).

- 3.9 Does the information system covered by this system of records notice (SORN) transmit/share personal information, *e.g.*, personally identifiable information (PII), between the FCC information technology (ITC) network(s) and a public or other non-FCC IT network(s), which are not covered by this Privacy Impact Assessment?

Yes  
 No

Please explain your response:

The Reasonable Accommodations Requests information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, is a "stand alone" information system. It has no electronic links to any other FCC or non-FCC network systems.

If there is no information sharing or transmission, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

- 3.10 If the information system covered by this system of records noticed (SORN) transmits/shares personal information between the FCC network and a public or other non-FCC network, which is not covered by this Privacy Impact Assessment, what information is shared/transmitted/disclosed and for what purposes?

- 3.11 If there is such transmission/sharing of personal information, how is the information secured for transmission—what security measures are used to prevent unauthorized access during transmission, *i.e.*, encryption, *etc.*?

3.12 If there is sharing or transmission to other information systems, with what other non-FCC organizations, groups, and individuals will the information be shared?

(Check all that apply and provide a brief explanation)

- Other Federal agencies:
- State, local, or other government agencies:
- Businesses:
- Institutions:
- Individuals:
- Other groups:

If there is no “matching agreement,” *e.g.*, *Memorandum of Understand (MOU)*, *etc.*, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

3.13 What kind of “matching agreement,” *e.g.*, *Memorandum of Understanding (MOU)*, *etc.*, as defined by 5 U.S.C. 552a(u) of the Privacy Act, as amended, is there to cover the information sharing and/or transferal with the external organizations?

3.14 Is this a new or a renewed matching agreement?

- New matching agreement
- Renewed matching agreement

Please explain your response:

3.15 Has the matching agreement been reviewed and approved (or renewed) by the FCC’s Data Integrity Board, which has administrative oversight for all FCC matching agreements?

- Yes  
If yes, on what date was the agreement approved:
- No

Please explain your response:

3.17 How is the information that is covered by this system of records notice (SORN) transmitted or disclosed with the external organization(s) under the *MOU* or other “matching agreement?”

3.18 How is the shared information secured by the recipient under the *MOU*, or other “matching agreement?”

#### **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

OMB regulations require Federal agencies to insure that the information/data that they collect and use meets the highest possible level of quality and integrity. It is important, therefore, that the information the Commission’s information systems use meets the “benchmark standards” established for the information.

4.1 How will the information that is collected from FCC sources, including FCC employees and contractors, be checked for accuracy and adherence to the Data Quality guidelines?  
(Please check all that apply)

- Information is processed and maintained only for the purposes for which it is collected.
- Information is reliable for its intended use(s).
- Information is accurate.
- Information is complete.
- Information is current.
- Not applicable:

Please explain any exceptions or clarifications:

The information contained in the Reasonable Accommodations Requests information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, is collected from information that FCC employees provide on EEOC Form 557, "Disability Accommodation Form," the FCC's "Reasonable Accommodation Request Questionnaire" attachment, and any accompanying information, *i.e.*, medical records, e-mails, *etc.*, that the employee submits to OWD that proves that the individual's impairment (affecting his/her major life activity(s)) warrant this accommodation by the FCC, as required by EEOC regulations. The FCC may investigate any discrepancies in the data that individuals provide to prove that their requests meet the requisite guidelines.

If the Data Quality Guidelines do not apply to the information in this information system, please skip to **Section 5.0 Safety and Security Requirements:**

4.2 Is any information collected from non-FCC sources; if so, how will the information sources be checked for accuracy and adherence to the Data Quality guidelines?  
(Please check all that apply and provide an explanation)

- Yes, information is collected from non-FCC sources: Individuals requesting reasonable accommodations may submit medical records and other data along with EEOC Form 557 and the FCC's "Reasonable Accommodation Request Questionnaire" attachment to substantiate their request(s).
  - Information is processed and maintained only for the purposes for which it is collected:
    - Information is reliable for its intended use(s):
    - Information is accurate:
    - Information is complete:
    - Information is current:
- No information comes from non-FCC sources:

Please explain any exceptions or clarifications:

The Reasonable Accommodations Requests information system only collects data, including the PII covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, which are related to an individual's request for accommodation as required by EEOC regulations.

If the information that is covered by this system of records notice (SORN) is not being aggregated or consolidated, please skip to Question 4.5.

- 4.3 If the information that is covered by this system of records notice (SORN) is being aggregated or consolidated, what controls are in place to insure that the information is relevant, accurate, and complete?
- 4.4. What policies and procedures do the information system’s administrators and managers use to insure that the information adheres to the Data Quality guidelines both when the information is obtained from its sources and when the information is aggregated or consolidated for the use by the bureaus and offices?
- 4.5 How often are the policies and procedures checked routinely—what type of annual verification schedule has been established to insure that the information that is covered by this system of records notice adheres to the Data Quality guidelines?

The OWD staff does an annual and also monthly reviews of the information contained in the Reasonable Accommodations Requests information system's electronic records and paper files and documents to insure that the information is current and up-to-date.

The monthly reviews are done as part of the OWD staff's preparations for issuing their "Status of EEO Complaints and Accommodations" monthly reporting chart.

**Section 5.0 Safety and Security Requirements:**

- 5.1 How are the records/information/data in the information system covered by this system of records notice (SORN) stored and maintained?

- IT database management system (DBMS)
- Storage media including diskettes, CDs, CD-ROMs, *etc.*
- Electronic tape
- Paper files
- Other:

- 5.2 Is the information collected, stored, analyzed, or maintained by this information system available in another form or from another source (other than a “matching agreement” or *MOU*, as noted above)?

- Yes
- No

Please explain your response:

All information that the Reasonable Accommodation Request information system collects, uses, and maintains is obtained from the data that an individual provides to OWD on EEOC Form 557, the FCC's "Reasonable Accommodation Request Questionnaire" attachment, and any accompanying documentation, *i.e.*, medical records, *etc.*, to substantiate his/her request that the FCC take reasonable actions to accommodate the individual in light of his/her impairment, *e.g.*, disability, special needs, job performance issues, *etc.*, in the office, workstation, public spaces, or other FCC facilities, *i.e.*, parking, *etc.*

5.3 Is the information system covered by this system of records notice (SORN) part of another FCC information system that collects personally identifiable information (PII)?

- Yes  
 No

Please explain your response:

The Reasonable Accommodation Request information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, is a "stand alone" information system with no electronic links to either FCC or non-FCC information systems.

If this information system is not part of another FCC information system, please skip to Question 5.7.

5.4 If the information system (under review here) has personally identifiable information (PII) and is part of another FCC information system, is there a transfer of records/data/information between these two FCC information system(s)?

- Yes  
 No

Please explain your response:

5.5 If the information system's personally identifiable information (PII) is part of another FCC information system, does the information system have processes and/or applications that are part of those from the other FCC information systems?

- Yes  
 No

Please explain your response:

5.6 If either or both such situations, as noted in Questions 5.4 and 5.5 exist, what security controls are there to protect the PII information and to prevent unauthorized access?

- Not applicable.

Please explain your response:

5.7 Would the unavailability of this information system prevent the timely performance of FCC operations?

- Yes  
 No

Please explain your response:

The Reasonable Accommodation Request information system performs a necessary a function for the Commission. This information system collects, stores, maintains, and uses the data that the FCC's Office of Workplace Diversity (OWD) staff uses to comply with EEOC regulations to accommodate the special needs of FCC employees in their offices or work stations, or to provide access to or to use other FCC facilities such as the parking garage. This information system's function is necessary for the FCC to meet its statutory and regulatory duties to insure that the

FCC's offices and workstations and other facilities comply with EEOC regulations as required under the Americans with Disabilities Act (ADA) and other Federal regulations.

- 5.8 Will the information system include an externally facing information system or portal such as an Internet accessible web application at [www.fcc.gov](http://www.fcc.gov) or other URL that allows customers/users to access development, production, or internal FCC networks, and which may pose potential risks to the information's security?

- Yes  
 No

Please explain your response:

The information that the OWD staff obtains from FCC employees requesting reasonable accommodations, may include electronic and paper documents, files, and records and oral interviews (including telephone conversations). Although information may be sent to OWD from outside the FCC via the Internet, *i.e.*, e-mails containing attachments, *etc.*, there is no accessible web portal, and the FCC has various security protocols that prevent direct access to internal FCC networks when e-mails are sent to OWD.

If the information is collected by some method or mechanism other than the externally facing information system portal at [www.fcc.gov](http://www.fcc.gov) or other URL, please skip to Question 5.11.

- 5.9 If the information is collected via [www.fcc.gov](http://www.fcc.gov) or other URL from the individuals, how does the information system notify users about the Privacy Notice:

- Link to the FCC's privacy policies for all users: The OWD webpage has a link to the FCC's Privacy Policy at: <http://www.fcc.gov/fccprivacypolicy.html>.  
 Privacy notice displayed on the webpage:  
 Privacy notice printed at the end of the form or document:  
 Website uses another method to alert users to the Privacy Act Notice, as follows:  
 If there is no link or notice, why not:

- 5.10 If a privacy notice is displayed, which of the following are included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.  
 Purpose—describes the principal purpose(s) for which the information will be used.  
 Authority—specifies the legal authority that allows the information to be collected.  
 Conditions—specifies whether providing the information is voluntary, and the effects, if any, of not providing it.  
 Disclosures—specify the routine use(s) that may be made of the information.  
 Not applicable, as information will not be collected in this way.

Please explain your response:

- 5.11 Will the information system include another customer-facing web site not on [www.fcc.gov](http://www.fcc.gov) or other URL?

- Yes  
 No

Please explain your response:

As noted in Question 5.8 above, the OWD staff uses EEOC Form 557, "Diversity Accommodation Form" and the FCC's "Reasonable Accommodation Request Questionnaire" attachment. The two forms may be submitted in either the electronic or paper versions. OWD may also be contacted via e-mail.

If the information is collected by some method or mechanism other than via the FCC Internet website at [www.fcc.gov](http://www.fcc.gov) or the FCC Intranet for FCC employees and contractors working at the FCC, please skip to Question 5.14.

5.12 If the information system has a customer-facing web site via the FCC Intranet for FCC employees and contractors working at the FCC, does this web site(s) have a Privacy Act Notice and how is it displayed?

- Yes
- Notice is displayed prominently on this FCC Intranet website:
  - Link is provided to a general FCC Privacy Notice for all users:
  - Privacy Notice is printed at the end of the form or document:
  - Website uses another method to alert users to the Privacy Act Notice:
- No:

If there is no Privacy Act Notice, please explain why not:

5.13 If a privacy notice is displayed, which of the following information is included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

If information is collected by some method or mechanism other than by fax, e-mail, FCC form(s), or regular mail, please skip to Question 5.16.

5.14 If information is collected from the individual by fax, e-mail, FCC form(s), regular mail, or some other means not listed above, how is the privacy notice provided?

- Privacy notice is on the document, *e.g.*, FCC form, *etc.* EEOC Form 557, "Disability Accommodation Form" and the FCC's "Reasonable Accommodation Request Questionnaire" attachment include a privacy statement for both the electronic and paper versions of these documents.
- Privacy notice displayed on the webpage where the document is located:
- Statement on the document notifies the recipient that they may read the FCC Privacy Notice at [www.fcc.gov](http://www.fcc.gov).
- Website or FCC document uses other method(s) to alert users to the Privacy Act Notice:

- Privacy notice is provided via a recorded message or given verbally by the FCC staff handling telephone calls: OWD provides an oral privacy statement to individuals when they call about reasonable accommodations issues.
- No link or notice, please explain why not:
- Not applicable, as personally identifiable information (PII) will not be collected.

5.15 If a privacy notice is displayed, which of the following information is included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in any other way.

Please explain your response:

If there is no access to the information system from outside the FCC via [www.FCC.gov](http://www.FCC.gov) or other URL, please skip to Question 5.17.

5.16 If consumers may access the information and/or the information system on-line via [www.FCC.gov](http://www.FCC.gov), does it identify ages or is it directed to people under 13 years old?

- Yes
- No

Please explain your response:

5.17 Will the FCC use the newly obtained information or revised information in this information covered by the existing system of records notice (SORN) to make a determination about the individual?

- Yes
- No

Please explain your response:

The FCC's Reasonable Accommodations Request information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, is used solely to collect, maintain, store, and use the data that FCC employees (including full and part-time Commission employees, interns, co-op students, and temporary hires) provide to the OWD staff who use it to verify their accommodation requests and to comply with EEOC regulations under the Americans with Disabilities Act.

5.18 Do individuals have the right to decline to provide personally identifiable information (PII)?

- Yes
- No

Please explain your response:

FCC staff (including full and part-time Commission employees, interns, co-op students, and temporary hires, *etc.*) who request reasonable accommodations must provide documentation to substantiate their requests. The FCC's Office of Workplace Diversity (OWD) staff needs this information, as required by EEOC regulations, to determine the validity of the request and the extent to which the FCC needs to provide the reasonable accommodations in the individual's office, workstation, and/or other FCC facilities. Individuals who fail to provide the information may not be granted their request for reasonable accommodations.

5.19 Do individuals have the right to consent to particular uses of their personal information?

- Yes  
 No

Please explain your response:

Individuals do not have the right to consent to particular uses of their PII because the process to verify who is granted reasonable accommodations requires each individual who makes such a request to provide information to substantiate his/her request, as required by EEOC regulations and the Americans with Disabilities Act (ADA). The FCC can only comply with these requirements if this information system can make use of the requisite PII of those who are using making these reasonable accommodation requests.

If individuals do not have the right to consent to the use of their information, please skip to Question 5.22.

5.20 If individuals have the right to consent to the use of their personal information, how does the individual exercise this right?

5.21 What processes are used to notify and to obtain consent from the individuals whose personal information is being collected?

5.22 Is the information, *i.e.*, records, data, documents, *etc.*, that the information system collects, uses, maintains, *etc.*, being used to produce reports on the individuals whose PII is part of this information covered by the system of records notice (SORN)?

- Yes  
 No

Please explain your response:

OWD produces a monthly report chart that provides information on the current status of those who have requested and been granted "reasonable accommodations." This report is part of OWD's mission, which is to:

- (1) To provide a method by which the FCC can identify each Commission employee who has requested "reasonable accommodations" in his/her office, work station, or to use other Commission facilities; and
- (2) To maintain information on the disposition of each individual's request for "reasonable accommodation."

5.23 What safeguards and security measures, including physical and technical access controls, are in place to secure the information and to minimize unauthorized access, use, or dissemination of the information that is stored and maintained in the information system?  
(Check all that apply)

- Account name
- Passwords
  - Accounts are locked after a set period of inactivity
  - Passwords have security features to prevent unauthorized disclosure, *e.g.*, “hacking”
  - Accounts are locked after a set number of incorrect attempts
  - One time password token
  - Other security features:
- Firewall
- Virtual private network (VPN)
- Data encryption:
- Intrusion detection application (IDS)
- Common access cards (CAC)
- Smart cards
- Biometrics
- Public key infrastructure (PKI)
- Locked file cabinets or fireproof safes
- Locked rooms, with restricted access when not in use
- Locked rooms, without restricted access
- Documents physically marked as “sensitive”
- Guards
  - Identification badges
  - Key cards
  - Cipher locks
  - Closed circuit TV (CCTV)
  - Other:

5.24 Please explain what staff security training and other measures are in place to assure that the security and privacy safeguards are maintained adequately?

All FCC employees and contractors who work with the information that is collected, used, stored and maintained in the Reasonable Accommodations Request information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodations Requests" SORN, are required to complete privacy training. In addition the OWD staff provides various notices and warnings to the employees and contractors who have access that the PII is not to be shared or disclosed without authorization.

5.25 How often are security controls reviewed?

- Six months or less:
- One year: The OWD staff reviews the security controls in the Reasonable Accommodations Request information system at least annually.
- Two years
- Three years
- Four years
- Five years
- Other:

- 5.26 How often are personnel (information system administrators, users, information system/information system developers, contractors, *etc.*) who use the information system trained and made aware of their responsibilities for protecting the information?
- There is no training
  - One year: In September 2006, the FCC inaugurated a Commission-wide privacy training program that has required all FCC employees and contractors to complete an initial privacy training course and to take a refresher course annually thereafter, as required by the Office of Management and Budget (OMB).
  - Two years
  - Three years
  - Four years
  - Five years
  - Other:

If privacy training is provided, please skip to Question 5.28.

- 5.27 What are the safeguards to insure that there are few opportunities for disclosure, unavailability, modification, and/or damage to the information system covered by this system of records notice (SORN), and/or prevention of timely performance of FCC operations if operational training is not provided?

- 5.28 How often must staff be “re-certified” that they understand the risks when working with personally identifiable information (PII)?
- Less than one year:
  - One year: The OWD staff requires that those who use this information system, including FCC employees and contractors working at the FCC, must be trained at once a year about their responsibilities for protecting the PII contained in the Reasonable Accommodations Request information system.
  - Two years
  - Three or more years
  - Other re-certification procedures:

- 5.29 Do the Commission’s training and security requirements for this information system that is covered by this system of records notice (SORN) conform to the requirements of the Federal Information Security Management Act (FISMA)?

- Yes
- No

Please explain your response:

The Reasonable Accommodations Request information system is a non-major information system, and as such, it is exempt from the FISMA requirements.

If the Privacy Threshold Analysis was completed recently as part of the information system’s evaluation, please skip to Question 5.34.

5.30 What is the potential impact on individuals on whom the information is maintained in the information system(s) if unauthorized disclosure or misuse of information occurs?  
(check one)

- Results in little or no harm, embarrassment, inconvenience, or unfairness to the individual.
- Results in moderate harm, embarrassment, inconvenience, or unfairness to the individual.
- Results in significant harm, embarrassment, inconvenient, or unfairness to the individual.

Please explain your response:

The Reasonable Accommodations Request information system requires individuals who request reasonable accommodations in their office, workstation, and/or other FCC facilities to provide PII to substantiate their request. The PII may include medical records and other sensitive documents whose unauthorized disclosure may cause the individuals embarrassment, *etc.*

5.31 Is the impact level for the information system(s) covered by this system of records notice (SORN) consistent with the guidelines as determined by the FIPS 199 assessment?

- Yes
- No

Please explain your response:

The Reasonable Accommodations Request information system is a non-major information system, and as such, it is exempt from the FIPS 199 assessment guidelines.

5.32 Has a "Certification and Accreditation" (C&A) been completed for the information system(s) covered this system of records notice (SORN)?

- Yes
- No

If yes, please explain your response and give the C&A completion date:

The Reasonable Accommodations Request information system is a non-major information system, and as such, it is exempt from the C&A requirement.

5.33 Has the Chief Information Officer (CIO) and/or the Chief Security Officer (CSO) designated this information system as requiring one or more of the following:

- Independent risk assessment:
- Independent security test and evaluation:
- Other risk assessment and/or security testing procedures, *etc.*: The FCC conducts an "in house" review.
- Not applicable:

5.34 Is the system using technology in ways that the Commission has not done so previously, *i.e.*, Smart Cards, Caller-ID, *etc*?

- Yes
- No

Please explain your response:

The OWD staff is making only minor, non-substantive changes to the Reasonable Accommodations Requests information system, including the PII covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN. These changes do not include any new

technologies or modifications to existing information technology that the Commission has not used previously.

- 5.35 How does the use of the technology affect the privacy of the general public and FCC employees and contractors?

The Reasonable Accommodations Request information system uses both electronic records, files, and data, and paper documents and files, *e.g.*, the paper versions (or a paper copy of the electronic version) of EEOC Form 557, the FCC's "Reasonable Accommodation Request Questionnaire" attachment, supporting documentation, *i.e.*, medical records, affidavits, certifications, *etc.*, and e-mails, interview notes, and miscellaneous documents and records that FCC employees submit to OWD as part of their request for reasonable accommodations in their office, workstation, and/or other FCC facilities.

The OWD staff uses the FCC's computer network databases primarily to store these documents and records and to compile the OWD "Status of EEO Complaints and Accommodations" monthly report charts on "reasonable accommodations." Thus, the use of information technology by this information system has only minimal impacts on the privacy of the FCC employees, except as required under EEOC regulations and the ADA statutes.

- 5.36 Will the information system that is covered by this system of records notice (SORN) include a capability to identify, locate, and/or monitor individuals?

Yes  
 No

Please explain your response:

The Reasonable Accommodations Request information system is used to collect, store, maintain, compile, and use the information pertaining the reasonable accommodation requests that OWD staff obtains from the electronic records, files, and data, and paper documents and files, including the electronic and/or paper versions of EEOC Form 557, the FCC's "Reasonable Accommodation Request Questionnaire" attachment, e-mails, interview notes, and supporting documentation, *i.e.*, medical records, affidavits, certifications, *etc.*, which FCC employees submit to OWD when they make a request for reasonable accommodations.

The information system does include information in its electronic files and records database and paper documents and records on the location of the offices/workstations of these individuals whose requests have been approved, but the information system does not include any monitoring capabilities.

If the information system does not include any monitoring capabilities, please skip to **Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA)**:

- 5.37 If the information system includes these technical capabilities identified in Questions 5.34 through 5.36 above, what kinds of information will be collected as a function of the monitoring of individuals?

5.38 Does the information system covered by this system of records notice (SORN) contain any controls, policies, and procedures to prevent unauthorized monitoring?

- Yes
- No

Please explain your response:

**Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA):**

6.1 Does this system of records notice (SORN) require non-FCC employees and contractors to perform any paperwork or recordkeeping activities?

- Yes, individuals, who are not FCC employees or contractors, are required to complete paperwork or recordkeeping functions or activities, *i.e.*, fill out forms and/or licenses, participate in surveys, and or maintain records *etc.*

Please explain your response:

- No, individuals, who are not FCC employees or contractors, are not required to perform any paperwork or recordkeeping functions or activities

Please explain your response:

- No, this system of records notice includes only FCC employees and/or contractors, which exempts it from the PRA. Please skip to **Section 7.0 Correction and Redress:**

6.2 If the information system requests information, such as the information necessary to complete an FCC form, license, authorization, *etc.*, has the information collection covered by this system of records notice (SORN) been identified for possible inclusion under the FCC's Paperwork Reduction Act (PRA) requirements?

- Yes
- No

Please explain your response:

If there are no PRA information collections associated with the information system or its applications, please skip to **Section 7.0 Correction and Redress:**

6.3 If there are one or more PRA information collections that are covered by this system of records notice (SORN) that are associated with the information system's databases and paper files, please list the OMB Control Number, Title of the collection, and Form number(s) as applicable for the information collection(s):

- 6.4 If there are any FCC forms associated with the information system(s) covered by this system of records notice (SORN), do the forms carry the Privacy Act notice?
- Yes:  
 No  
 Not applicable—the information collection does not include any forms.
- 6.5 Have the system managers contacted the Performance Evaluation and Records Management (PERM) staff to coordinate PRA requirements and submission of the information collection to the Office of Management and Budget?
- Yes  
 No
- Please explain your response:

**Section 7.0 Correction and Redress:**

- 7.1 Are the procedures for individuals wishing to inquire whether this system of records notice (SORN) contains information about them consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?
- Yes  
 No
- Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:
- Individuals wishing to inquire whether the Reasonable Accommodations Request information system, which is covered by the FCC/OWD-1, “Reasonable Accommodation Requests” SORN, contains information about them may address their inquiries to the system manager in the Office of Workplace Diversity. This is consistent with FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act, as noted in this SORN.
- 7.2 Are the procedures for individuals to gain access to their own records/information/data in this information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?
- Yes  
 No
- Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:
- Individuals who seek access to the information about them that is contained in the Reasonable Accommodations Request information system, and which is covered by FCC/OWD-1, “Reasonable Accommodation Requests” SORN, may address their inquiries to the system manager in the Office of Workplace Diversity. This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

7.3 Are the procedures for individuals seeking to correct or to amend records/information/data about them in the information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

- Yes  
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals seeking to correct or to amend information about them in the Reasonable Accommodations Request information system, which is covered by FCC/OWD-1, “Reasonable Accommodation Requests” SORN, may address their inquiries to the system manager in the Office of Workplace Diversity. This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

7.4 Does the FCC provide any redress to amend or correct information about an individual covered by this system of records notice (SORN), and if so, what alternatives are available to the individual, and are these consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

- Yes  
 No

Please explain your response:

Individuals seeking any redress to amend or correct information about them in the Reasonable Accommodations Request information system, which is covered by FCC/OWD-1, “Reasonable Accommodation Requests” SORN, may address their inquiries to the system manager in the Office of Workplace Diversity. This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

If this is a new system of records notice (SORN), please skip to Question 7.6.

7.5 Have the sources for the categories of records in the information system(s) covered by this system of records notice (SORN) changed?

- Yes  
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

The sources for the categories of records in the FCC/OWD-1, “Reasonable Accommodation Requests” SORN, which covers the PII that is collected, used, and maintained by the Reasonable Accommodations Requests information system remain unchanged. These record sources include the FCC employee's first and last names and corresponding identification number, telephone number, organization unit (bureau/office), room/workstation number, (reasonable accommodation authorization) issue date, property pass privileges (if applicable).

7.6 Does this system of records notice (SORN) claim any exemptions to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about them in this SORN, and if so, are these exemptions consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.561?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

FCC/OWD-1, "Reasonable Accommodation Requests" SORN, does not claim any exemption to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about themselves in this SORN.

7.7 What processes are in place to monitor and to respond to privacy and/or security incidents? Please specify what is changing if this is an existing system of records notice (SORN) that is being updated or revised?

The OWD staff has posted notices that the information in the Reasonable Accommodation Requests information system's electronic records, which are covered by FCC/OWD-1, "Reasonable Accommodation Requests" SORN, are "non public for internal use only." The OWD staff also issues reminders periodically to those granted access to the information that they are to keep the information confidential and to safeguard any printed materials.

7.8 How often is the information system audited to ensure compliance with FCC and OMB regulations and to determine new needs?

- Six months or less:
- One year
- Two years
- Three years
- Four years
- Five years
- Other audit scheduling procedure(s): As noted in Question 4.5 above, the OWD staff does a monthly review of the information contained in the Reasonable Accommodations Requests information system to compile the OWD "Status of EEO Complaints and Accommodations" monthly chart and an annual review of all employees who have requested reasonable accommodations, the nature of their request, *etc.*

**Section 8.0 Consumer Satisfaction:**

8.1 Is there a customer satisfaction survey included as part of the public access to the information covered by this system of records notice (SORN)?

- Yes
- No
- Not applicable

Please explain your response:

If there are no Consumer Satisfaction requirements, please skip to **Section 9.0 Risk Assessment and Mitigation:**

8.2 Have any potential Paperwork Reduction Act (PRA) issues been addressed prior to implementation of the customer satisfaction survey?

- Yes
- No

Please explain your response:

If there are no PRA issues, please skip to **Section 9.0 Risk Assessment and Mitigation:**

8.3 If there are PRA issues, were these issues addressed in the PRA component of this PIA template?

- Yes
- No

Please explain your response:

**Section 9.0 Risk Assessment and Mitigation:**

9.1 What are the potential privacy risks for the information covered by this system of records notice (SORN), and what practices and procedures have you adopted to minimize them?

<b>Risks:</b>	<b>Mitigating factors:</b>
a. The Reasonable Accommodations Requests information system's PII includes electronic records, files, and data that are stored in the FCC's computer network databases.	a. PII that is contained in electronic records, files, and data in this information system is protected by the FCC's computer network databases, which require users to provide login's and access rights to these records.
b. Some of the information in the Reasonable Accommodations Requests information system's PII is contained in paper copy documents, records, and files that are stored in file cabinets.	b. The PII that is contained in these paper documents, files, and records is stored in file cabinets in "non public areas" in the OWD office suite. These file cabinets are locked when not in use.

9.2 What is the projected production/implementation date for the information system:

Initial implementation: April 2006  
 Secondary implementation: June 2009  
 Tertiary implementation:  
 Other implementation:

9.3 Are there any ancillary and/or auxiliary information system(s) applications linked to this information system that is covered by this system of records notice (SORN), which may also require a Privacy Impact Assessment (PIA)?

- Yes
- No

If so, please state the application(s), if a Privacy Impact Assessment (PIA) has been done, and the completion date for PIA:

At this time, the OWD staff does not anticipate that there will be any new ancillary or auxiliary information systems linked to the Reasonable Accommodations Requests information system.