NASA IT Privacy Impact Assessment (PIA) Analysis Worksheet

Application Name:

NASA.ASEE.ORG

(generally the name that the system is accessed by, www.nasa.gov, when Web enabled, for example)

Application Owner:

Person responsible for funding

System Manager:

Person responsible for technical operation

NASA Cognizant Official:

NASA individual responsible for management of daily operations

Activity/Purpose of Application:

Mission Program/Project Supported:

IT Security Plan Number:

System Location:

(Center or contractor office building, room, city and state)

Privacy Act System of Records (SOR) number:

OMB Information Collection Approval Number and

Expiration Date:

Other Identifying Numbers:

Anthony M. Springer

Phone Number: 202-358-0848 E-Mail:tony.springer@nasa.gov

Steve Woodward

Phone Number: 202-331-3518 E-Mail: s.woodward@asee.org

ANTHONY M. SPRINGER

Phone Number: 202.358.0848

E-Mail: anthony.m.springer@nasa.gov

Application for Aeronautics Scholarship Program

Aeronautics research Mission Directorate

NN-101-M-NHQ-0018

Center:American Society for Engineering Educatio

Street Address:1818 N St. NW

Building:STE 600 City:Washington State:DC ZIP:2700-0134

10NASP

2700-0134 28 FEB 09

NNH 08CC19C

Privacy Question Sets	Response	Comments
Section I - System Questions 1-18 must be completed for all system	Characterization ems as part of the IT Se	and Data Categorization curity Certification and Accreditation Process.
Is this a new system or has any of the major changes listed in the Comments column occurred to the system since April 2003 or the conduct of the last PIA?	● Yes ○ No	 ☑ This is a new system not in production previously ☐ This system has never previously been assessed ☐ Conversions ☐ Anonymous to Non-Anonymous ☐ Significant System Management Changes ☐ Significant Merging ☐ New Public Access ☐ Commercial Sources ☐ Internal Flow or Collection ☐ New Interagency Use ☐ Alteration in Character of Data
Does/will the system provide a new, or modernize/enhance an existing capability, service or function for NASA?	● Yes ○ No ○ NA	□ Is over \$500,000 in value. □ Affects more than one Center. □ Affects more than 100 people. □ Is a major investment requiring an OMB 300 (also called an exhibit 300). □ Enterprise Architecture review of the system has been directed by the Mission Directorate CIO, Center CIOS, NASA CIO, or Program/Project/Service Manager.
3. Does/will the system contribute to the continuation or longevity of a previous NASA investment for capability, service or function?	O Yes O No ● NA	□ Is over \$500,000 in value. □ Affects more than one Center. □ Affects more than 100 people. □ Is a major investment requiring an OMB 300 (also called an exhibit 300). □ Enterprise Architecture review of the system has been directed by the Mission Directorate CIO, Center CIOS, NASA CIO, or Program/Project/Service Manager.

Privacy Question Sets	Response	Comments
4. Does the system represent some balanced combination (50/50, 60/40, 70/30) of the previous 2 questions (e.g., developing a new capability, service or function while contributing to the continuation of a previous NASA investment)?	O Yes O No ● NA	□ Is over \$1,000,000 in total lifecycle value (Initial Development + Est. Lifecycle) □ Affects more than one Center. □ Affects more than 100 people. □ Is a major investment requiring an OMB 300 (also called an exhibit 300). □ Enterprise Architecture review of the system has been directed by the Mission Directorate CIO, Center CIOS, NASA CIO, or Program/Project/Service Manager.
5. Does/Will the system contain Federal records?	● Yes ○ No ○ NA	
6. If the system contains/will contain Federal records, under which disposition authority item in the NASA Records Retention Schedules (NRRS) or the General Records Schedules (GRS) are/will the records be retained and disposed of or archived?	NRRS GRS None	Schedule 1, item 32
7. Are the records in this system (or will they be) generated in the process of NASA program/project formulation, design, development, or operation as described in NPR 7120?	O Yes ⊙ No O NA	
8. Are the records Vital records for the organization?	O Yes ⊙ No O NA	
9. Are backup files (tapes or other media) being stored off-site?	O Yes O No ⊙ NA	
10. Does/will the system collect information in a standard way (forms, web enabled form, survey, questionnaire, etc) from members of the public (including contractors), regardless of format (paper, electronic or oral)?	● Yes ○ No ○ NA	Personal identifying information Other (Describe): Name, Address, Phone, E-Mail, School and Academic Records, Graduate Record Examination (GRE) scores, research proposal and personal reference information
11. Is the information collection indicated above authorized by an OMB Approval Number under the Paperwork Reduction Act (PRA)? If yes, please provide PRA Approval Number under Comments.	O No NA	PRA OMB Approval Number: 2700-0134

Privacy Question Sets	Response	Comments
12. Does/Will the system contain (store) information in identifiable form (IIF) within any database(s), record(s), file(s) or Web site(s) hosted by this system? If yes, check all that apply in the Comments column. If the category of personal information is not listed, please check Other and identify the category. Please note: This question seeks to identify all personal information contained within the system. This includes any IIF, whether or not it is subject to the Privacy Act, whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the Privacy Act or other legislation.	● Yes ○ No ○ NA	Personal Information Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver license Biometric identifiers (e.g., fingerprint and voiceprint) Mother maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or records Foreign activities and/or interests Other (Describe):

Privacy Question Sets	Response	Comments
13. Indicate all the categories of individuals about whom IIF is or will be collected.	● Yes ○ No ○ NA	Categories of individuals: Employees Members of the public (excluding contractors and partners) Patients Business partners/contractors (including, but not limited to federal, state, local agencies) Vendors/Suppliers/Contractors Other:

Privacy Question Sets	Response	Comments
14. Are records on the system or will records on the system be retrieved by one or more data elements?	● Yes ○ No ○ NA	□ Personal Information Name □ Date of birth □ Social Security Number (or other number originated by a government that specifically identifies an individual) □ Photographic identifiers (e.g., photograph
		image, x-rays, and video) □ Driver license □ Biometric identifiers (e.g., fingerprint and voiceprint) □ Mother maiden name □ Vehicle identifiers (e.g., license plates)
		□ Mailing address □ Phone numbers (e.g., phone, fax, and cell) □ Medical records numbers □ Medical notes
		□ Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) □ Certificates (e.g., birth, death, and marriage) □ Legal documents or notes (e.g., divorce
		decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address
		■ Education records □ Military status and/or records □ Employment status and/or records □ Foreign activities and/or interests □ Other (Describe):
15. Are/Will records on 10 or more members of the public containing IIF [be] maintained, stored or transmitted/passed through this system?	O Yes O No O NA	
16. Is the system (or will it be) subject to the Privacy Act?	● Yes ○ No ○ NA	

Privacy Question Sets	Response	Comments
17. Has a Privacy Act System of Records (SOR) Notice been published in the Federal Register for this system? If no, choose the reason of why not or specify other reason in the Comments column.	O Yes ⊙ No O NA	□ No IIF is contained in the system. □ IIF is in the system, but records are not retrieved by individual identifier. □ Should have published an SOR, but was unaware of the requirement. □ System is required to have an SOR but is not yet procured or operational. ☑ Other (Describe): SORN 10NASP Submitted for publishing 18 FEB 09.
18. If a SOR Notice has been published, have major changes to the system occurred since publication of the SOR?	O Yes O No ● NA	
Section II Questions 19 through 32 concern the way in ware especially critical to determining whether the regulations.	 Information Sh hich information is used, se use and operation of the 	transferred, stored, and processed. These questions
19. Is the IIF in the system voluntarily submitted (or will it be)?	Yes No NA	
20. Does/Will the system collect IIF directly from individuals?	● Yes ○ No ○ NA	
21. Does/Will the system collect IIF from other resources (i.e., databases, Web sites, etc.)?	O Yes ⊙ No O NA	
22. Does/Will the system populate data for other resources (i.e., do databases, Web sites, or other resources rely on this system's data)?	O Yes ⊙ No O NA	Resource and Purpose: 1 2 3 4 Other
23. Does/Will the system share or disclose IIF with agencies external to NASA, or other people or organizations outside NASA?	O Yes ● No O NA	With whom and for what purpose: 1 2 3 4 Other

Pulling Operation Service		
Privacy Question Sets	Response	Comments
24. If the IIF in the system is or will be matched against IIF in one or more other computer systems internal or external to NASA, are (or will there be) computer data matching agreement(s) in place?	O Yes O No No	Location of other systems involved in matching: Internal to NASA External to NASA Other systems involved in matching:
25. Will the IIF be de-identified, aggregated, or otherwise made anonymous?	O Yes O No O NA	☐ De-identified ☐ Aggregated ☐ Anonymous
26. Is there a process, either planned or in place, to notify organizations or systems that are dependent upon the IIF contained in this system when changes occur (i.e., revisions to IIF, when the system encounters a major change, or is replaced)?	O Yes O No No	
27. Is there a process, either planned or in place, to notify and obtain consent from the individuals whose IIF is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection?	O Yes ● No O NA	
28. Is there (or will there be) a process in place for individuals to choose how their IIF is used?	O Yes ● No O NA	Process:
29. Is there (or will there be) a complaint process in place for individuals who believe that their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate?	O Yes O No O NA	
30. Are there (or will there be) processes in place for periodic reviews of IIF contained in the system to ensure the data's integrity, availability, accuracy, and relevance?	Yes No NA	

Privacy Question Sets	Response	Comments
31. Are there (or will there be) rules of conduct in place for access to IIF on the system?	● Yes ○ No ○ NA	☐ Users ☐ Administrators ☐ Developers ☐ Contractors For what purpose: 1 Scholarship Payment Processing 2 Administration and Maintenance 3 4 Other
32. Is there (or will there be) a process in place to log routine and non-routine disclosures and/or unauthorized access?	• Yes • No • NA	Disclosures logged (check all apply): Routine Non-routine Public Internet (Describe):
Section III - Web Site Hosting Practices Questions 33 through 46 concern systems that host Web sites. If a system hosts a Web site, system owners must comply with requirements involving notice and information collection practices. If the system does not host a Web site, the majority of these questions can be answered 'N/A'.		
33. Does/Will the system have a Web interface?	● Yes ○ No ○ NA	Type of site (check all apply): Public Internet (Describe): Public site for graduate level scholarship students Internal NASA (Describe):
34. Is the Web site (or will it be) accessible by the public or other entities (i.e., federal, state, and local agencies, contractors, third-party administrators, etc.)?	● Yes O No O NA	General Public Students with Scholarship Interests
35. Is the Agency Web site privacy policy statement posted (or will it be posted) on the Web site?	● Yes ○ No ○ NA	
36. Is the Web site's privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)?	O Yes ● No O NA	Implementation Plan: Discussed and working with them to re-implement

Privacy Question Sets	Response	Comments
37. Does/Will the Web site employ persistent tracking technologies?	O Yes ● No O NA	□ Session cookies □ Persistent cookies □ Web bugs □ Web beacons □ Other (Describe): Authorizing Official: Authorizing Date:
38. Does/Will the Web site collect or maintain personal information from or about children under the age of 13?	O Yes ⊙ No O NA	
39. Does/Will the Web site collect or maintain personal information from or about children under the age of 13, please indicate how the information is collected?	⊙ NA	What Information is collected: How the information is collected (check all apply): Actively directly from the child Passively through cookies
40. If the Web site does/will collect or maintain personal information from or about children under the age of 13, is the information shared with any non-NASA organizations, grantees, universities, etc.?	O Yes O No NA	Information is shared with:
41. If the Web site does/will collect or maintain personal information from or about children under the age of 13, specify what method is used for obtaining parental consent?	⊚ NA	Method used for obtaining parental consent (check all apply): No consent is obtained Simple email Email accompanied by digital signature Signed form from the parent via postal mail or facsimile Accepting and verifying a credit card number in connection with a transaction Taking calls from parents, through a toll-free telephone number staffed by trained person

Privacy Question Sets	Response	Comments
42. Does/Will the Web site collect IIF	• Yes	■ Personal Information
electronically from any individuals?		Name
	O No	
	ONA	Date of birth
		Social Security Number (or other number originated by a government that specifically identifies an individual)
		□ Photographic identifiers (e.g., photograph image, x-rays, and video)
		□ Driver license
	TOTAL	☐ Biometric identifiers (e.g., fingerprint and voiceprint)
		☐ Mother maiden name
		☐ Vehicle identifiers (e.g., license plates)
	777777777777777777777777777777777777777	Mailing address
		Phone numbers (e.g., phone, fax, and cell)
		☐ Medical records numbers
		□ Medical notes
		Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN])
		☐ Certificates (e.g., birth, death, and marriage)
		☐ Legal documents or notes (e.g., divorce decree, criminal records, or other)
		☐ Device identifiers (e.g., pacemaker, hearing aid, or other)
		☐ Web Uniform Resource Locators (URL)
		■ E-mail address
		Education records
		☐ Military status and/or records
		☐ Employment status and/or records
		☐ Foreign activities and/or interests
		Other (Describe): demographic data

Privacy Question Sets	Response	Comments
43. Does/Will the Web site provide a PDF form to be completed with IIF from		
	O Yes	□ Personal Information
any individuals and then mailed or otherwise provided to NASA?	⊙ No	□ Name
	ONA	□ Date of birth
		☐ Social Security Number (or other number originated by a government that specifically identifies an individual)
	THE PROPERTY OF THE PROPERTY O	☐ Photographic identifiers (e.g., photograph image, x-rays, and video)
		□ Driver license
		☐ Biometric identifiers (e.g., fingerprint and voiceprint)
	A PROTECTION AND A PART OF THE	☐ Mother maiden name
		□ Vehicle identifiers (e.g., license plates)
		☐ Mailing address
		☐ Phone numbers (e.g., phone, fax, and cell)
		☐ Medical records numbers
		□ Medical notes
		☐ Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN])
		☐ Certificates (e.g., birth, death, and marriage)
		☐ Legal documents or notes (e.g., divorce decree, criminal records, or other)
		Device identifiers (e.g., pacemaker, hearing aid, or other)
		□ Web Uniform Resource Locators (URL)
		□ E-mail address
		□ Education records
		☐ Military status and/or records
		□ Employment status and/or records
		□ Foreign activities and/or interests
		☐ Other (Describe):
44. Does/Will the Web site share IIF with other organizations within NASA,	O Yes	With whom Information is shared:
agencies external to NASA, or other people or organizations outside NASA?	⊙ No	1
· · ·	O NA	2
11		Other

Privacy Question Sets	Response	Comments
45. Are rules of conduct in place (or will they be in place) for access to IIF on the Web site?	● Yes ○ No ○ NA	■ Users □ Administrators □ Developers □ Contractors For what purpose: 1 Administration of Scholarship Programs 2 3 4 Other
46. Does/Will the Web site contain links to sites external to the Center that owns and/or operates the system?	● Yes ○ No ○ NA	☑ Disclaimer notice for all external links
Section IV - Administrative Controls Administrative controls are safeguards to ensure proper management and control of information and information systems. These safeguards include policies, the PIA itself, and certification and accreditation (CA) programs. Questions 47 through 52 are relevant to the administrative controls that are in place to protect the IIF in the system in question.		
47. Has the system been certified and accredited (authorized to operate): 'y' or 'n'?	O Yes ⊙ No O NA	C&A Plan/Timeline: IATO is being issued by Tony Springer at NASA HQ. Security Plan was submitted and reviewed by IT&CD, Greg Kerr.
48. Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been (or will they be) trained and made aware of their responsibilities for protecting the IIF being collected and maintained?	● Yes ○ No ○ NA	
49. Who has/will have access to the IIF on the system?	O Hidden	Check all that apply Users Administrators Developers Contractors Others
50. If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?	● Yes O No O NA	

Privacy Question Sets	Response	Comments
51. Are methods in place to ensure that access to IIF is restricted to only those required to perform their official duties?	• Yes • No • NA	Method(s): Usernames and passwords Data encryption
52. Are there policies or guidelines in place for the retention and destruction of IIF within the application/system?	Yes No NA	Policies/Practices: Standard storing of applicant data for 3 years.
Section V - Technical Controls Technical controls are safeguards that the computer system generally executes. Technical safeguards include password protection, firewalls, and cryptography. All of these items are covered in NASA Security plans that should be in place for every system. Questions 53, 54, and 55 focus on the technical controls of the system.		
53. Are technical controls in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system (or will there be)?	● Yes ○ No ○ NA	
54. Are any of the password controls listed in the Comments column in place (or will there be)?	O Yes O No ⊙ NA	Check all that apply: Passwords expire after a set period of time. Accounts are locked after a set period of inactivity. Minimum length of passwords is eight characters. Passwords must be a combination of uppercase, lowercase, and special characters. Accounts are locked after a set number of incorrect attempts.
55. Is there (or will there be) a process in place to monitor and respond to privacy and/or security incidents?	Yes No NA	
Section VI - Physical Controls Physical controls are measures taken to protect systems, buildings, and related supporting infrastructure against threats associated with their physical environment. These safeguards might include protections against fire, structural collapse, plumbing leaks, physical access controls, and controls against the intercept of data. Question 56 concerns physical controls applied to the system.		
56. Are physical access controls in place (or will they be)?	Yes No NA	

Privacy Impact Assessment (PIA) Summary

Date of this Submission: Feb 18, 2009

NASA Center: American Society for Engineering Educatio

Application Name: NASA.ASEE.ORG

Is this application or information collection new or is an existing one being modified? New

Does this application collect, maintain, and/or disseminate information in identifiable form (IIF)? Yes

Mission Program/Project Supported: Aeronautics research Mission Directorate

Identifying Numbers (Use N/A, where appropriate)
Privacy Act System of Records Number: 10NASP

OMB Information Collection Approval Number and Expiration Date; 2700-0134 28 FEB 09

Other Identifying Number(s): NNH 08CC19C

Description

1. Provide an overview of the application or collection and indicate the legislation authorizing this activity:

As part of the fellowship application, applicants provide information using the online application module that was created by ASEE. Applicants complete drop down menus and check boxes, as part of the application. They also upload essays and resumes that are converted to PDF format by the module.

2. Describe the information the agency will collect, maintain, or disseminate and how the agency will use the information. In this description, indicate whether the information contains IIF and whether submission is voluntary or mandatory:

As part of the fellowship application, applicants provide information regarding their current academic institution, essay, GPA, academic discipline and class standing. This information is mandatory. Applicants are also asked questions on a voluntary basis regarding their race, gender, ethnicity.

3. Explain how the IIF is collected, maintained, and/or disseminated is the minimum necessary to accomplish the purpose for this effort:

The IIF is collected through the online module, and it is maintained on a secure database that is housed at ASEE. The data is not disseminated for all applicants. The only data disseminated includes awardee first name, last name, schools, gender, race/ethnicity, institution and discipline once the online module has been closed.

4. Explain why the IIF is being collected, maintained, or disseminated:

The IIF is being collected to provide a package of student data that can be collected and reviewed by a group of academic panelists, in support of scholarhip funding.

5. Identify with whom the agency will share the IIF:

6. Describe how the IIF will be obtained, from whom it will be collected, what the suppliers of the information and the subjects will be told about the information collection, and how this message will be conveyed to them (e.g. written notice, electronic notice if a Web-based collection). Describe any opportunities for consent provided to individuals regarding what information is collected and how the information will be shared:

The IIF will be obtained from applicants to the fellowship, using the online application module that was created by ASEE. Applicants are asked to check a box to consent to their information being used in the selection process.

7. State whether the personal information will be collected from children under age 13 on the Internet and, if so, how parental or guardian approval will be obtained. (Reference: Children's Online Privacy Protection Act of 1998):

Information will not be collected from people under 13 years of age.

8. Describe how the IIF will be secured:

IIF data is encrypted using 256 bit AES encryption. The data is encrypted in all locations in which it is stored on electronic media, including any backups to disk or tape. The hardware on which the electronic media reside is inside a server room secured by a physical lock. Access to the data requires a user id and password.

9. Describe plans for retention and destruction on IIF:

IIF data will be retained for the duration of the contract and in accordance with current NASA Records Retention and Disposal guidelines. Retention is extended after the contract for as long as deemed appropriate or required by the program manager. When destruction is ordered ASEE will scrub the drives by overwriting the files with random data up to 32 times during deletion.

10. Identify whether a system of records is being created under section 552a of Title 5, United States Code (the Privacy Act), or identify the existing Privacy Act system of records notice under which the records will be maintained:

NASA System of Records Notice 10NASP.

Point of contact to whom a member of the public can address questions concerning this information system and the privacy concerns associated with it: ASEE Program Manager (202-331-3500)

This represents PIA approval with the understanding that the following follow-up actions will be completed:

1. P3P Machine Readable Privacy Policy will be implemented as required. Concur: ANTHONY M. SPRINGER NASA Cognizant Official Concur: Concur: BRYAN D. MCCALL NASA Headquarter Center CIO (Acting) Center Privacy Manager Approve: Concur: BOBBY L. CERMAN NASA CIO TERESA M. FRYER NASA Privacy Programs Manager Date 2-19-09