NASA IT Privacy Impact Assessment (PIA) Analysis Worksheet

System Name: LERCIP

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

System Owner: Susan Gott

Person responsible for funding

Phone Number:216-433-3833

E-Mail:Susan.F.Gott@nasa.gov

System Manager: Irene Wirkus

Person responsible for technical operation

Phone Number: 216-433-9399

E-Mail: Irene.a.wirkus@nasa.gov

NASA Cognizant Official: SUSAN F. GOTT

NASA individual responsible for management of daily operations

Phone Number: 216.433.3833

E-Mail: Susan.F.Gott@nasa.gov

Activity/Purpose of System: LERCIP application processing

Mission Program/Project Supported: Educational Programs Office - LERCIP Higher Ed

IT Security Plan Number: OA-9999-M-GRC-2202

System Location: Center:GRC

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

Street Address:21000 Brookpark Rd.

Building:142 City:Cleveland State:OH ZIP:44135

Privacy Act System of Records (SOR) number: NASA 10SPER Special Personnel Records

OMB Information Collection Approval Number and Expiration Date:

Emergency PRA request to Walter Kit, HQ - working with NASA Cognizant Official, Sue Gott

Other Identifying Numbers:

^{*} An "Information System" is defined as discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information.

Privacy Question Sets	Response	Comments
Section I - System (Questions 1-18 must be completed for all syste		and Data Categorization curity Certification and Accreditation Process.
1. 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?	YesNo	□ 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
2. Does/will the system provide a new, or modernize/enhance an existing capability, service or function for NASA?	YesNoNA	□ 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?	● 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.

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)?	● Yes ○ 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?	YesNoNA	
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 OGRS None	3.14 NASA Special Employment Files
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?	○ Yes	
8. Are the records Vital records for the organization?	○ Yes	
9. Are backup files (tapes or other media) being stored off-site?	YesNoNA	
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)?	YesNoNA	☑ Personal identifying information☐ Other (Describe):
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 Yes ● No O NA	PRA OMB Approval Number: Emergency PRA being prepared by Walter Kit, HQ

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)		☑ Personal Information
	O No	☑ Name
or Web site(s) hosted by this system? If yes, check all that apply in the	O NA	■ Date of birth
Comments column. If the category of personal information is not listed, please check Other and identify the category.Please note: This question		☐ Social Security Number (or other number originated by a government that specifically identifies an individual)
seeks to identify all personal information contained within the system. This includes any IIF, whether		☐ Photographic identifiers (e.g., photograph image, x-rays, and video)
or not it is subject to the Privacy Act, whether the individuals are employees,		□ Driver license
the public, research subjects, or business partners, and whether		☐ Biometric identifiers (e.g., fingerprint and voiceprint)
provided voluntarily or collected by mandate. Later questions will try to		□ Mother maiden name
understand the character of the data and its applicability to the requirements		□ Vehicle identifiers (e.g., license plates)
under the Privacy Act or other legislation.		□ 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		□ Personal Information
one or more data elements?	O No	☑ Name
	O NA	□ 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 members of the	Yes	
public or more individuals containing IIF [be] maintained, stored or	O No	
transmitted/passed through this system?	ONA	
16. Is the system (or will it be) subject		
to the Privacy Act?	⊙ Yes	
	O No	
	ONA	

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.	YesNoNA	 □ 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):
18. If a SOR Notice has been published, have major changes to the system occurred since publication of the SOR?	O Yes ● No O NA	
		transferred, stored, and processed. These questions
19. Is the IIF in the system voluntarily submitted (or will it be)?	YesNoNA	
20. Does/Will the system collect IIF directly from individuals?	YesNoNA	
21. Does/Will the system collect IIF from other resources (i.e., databases, Web sites, etc.)?	YesNoNA	
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)?	YesNoNA	Resource and Purpose: 1 Educational Programs Office Intranet; Populating Reports, internship selections 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?	○ Yes ② No ○ NA	With whom and for what purpose: 1 2 3 4 Other

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?	YesNoNA	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 ● 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)?	○ Yes ○ No ⊙ NA	
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?	○ Yes ○ No ● NA	
28. Is there (or will there be) a process in place for individuals to choose how their IIF is used?	YesNoNA	Process: Individuals are notified of intended use when they are asked to provide the information By Voluntarily providing the information they give consent to its use as described.
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?	YesNoNA	
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	

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 Processing of submitted data 2 Data Integretity and Development 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 ⑤ 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?	YesNoNA	Type of site (check all apply): ☑ Public Internet (Describe): It is an online application for a summer internship program ☐ 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.)?	YesNoNA	1 Public 2 3 4
35. Is the Agency Web site privacy policy statement posted (or will it be posted) on the Web site?	YesNoNA	
36. Is the Web site's privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)?	YesNoNA	Implementation Plan:

Privacy Question Sets	Response	Comments
37. Does/Will the Web site employ persistent tracking technologies?	○ Yes ② No ○ 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.?	○ Yes ○ 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 electronically from any individuals?		□ Personal Information
l coonstruction, manual and	O No	■ Name
	O NA	■ 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): Resume

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
otherwise provided to NASA?	O NA	□ 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):
44. Does/Will the Web site share IIF		With whom Information is shared:
with other organizations within NASA, agencies external to NASA, or other	O No	Potential Mentors at the Center
people or organizations outside NASA?	ONA	2
	0.00	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?	YesNoNA	☐ Users ☐ Administrators ☐ Developers ☐ Contractors For what purpose: 1 Evaluation of Applications 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 ② 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'?	YesNoNA	C&A Plan/Timeline: 12/2/2008
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?	YesNoNA	
49. Who has/will have access to the IIF on the system?		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?	YesNoNA	

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?	YesNoNA	Method(s): UserID and Passwords will be set up for those that need access. Following OCIO Recommended Practices.		
52. Are there policies or guidelines in place for the retention and destruction of IIF within the application/system?	YesNoNA	Policies/Practices: NASA Glenn Records Managment Policies are in place.		
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)?	YesNoNA			
54. Are any of the password controls listed in the Comments column in place (or will there be)?	YesNoNA	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?	YesNoNA			
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: Nov 17, 2009

NASA Center: GRC System Name: LERCIP

Is this application or information collection new or is an existing one being modified? Not New

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

Mission Program/Project Supported: Educational Programs Office - LERCIP Higher Ed

Identifying Numbers (Use N/A, where appropriate)

Privacy Act System of Records Number: NASA 10SPER Special Personnel Records

OMB Information Collection Approval Number and Expiration Date: Emergency PRA request to Walter

Kit, HQ - working with NASA Cognizant Official, Sue Gott

Other Identifying Number(s): N/A

Description

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

The Lewis Educational and Research Collaborative Internship Program (LERCIP) application is a web-based application that will provide college students the ability to submit an application and an electronic resume to GRC / OAI to apply for the LERCIP Program. OAI and EPO will use the CWA application to track the status of the submitted applications and related iinformation. Furthermore, they will use the application to mentors who will be able to review limited information on the students to identify candidates for the internship position. Administration options will be available to run selected reports and also purge the database of previous applications and reports.

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:

The information collected is information voluntarily submitted by users in order to apply for participation in a summer internship program.

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

In order to reduce paper used for this project, the bare minimum of information is collected via an online application web interface.

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

The IIF is collected so that individual applications can be obtained and processed.

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

The IIF collected in this system is not being shared outside of the agency. However, persons with proper access rights will be able to view this IIF during the application evaluation and selection process.

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 information will be collected via a web-based user interface. The target audience are student will be starting their freshman year of college in the upcoming Fall semester. Upon the successful submission of the online application, the user will receive an email stating that the submission prcess was successful.

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):

No information will be collected from children under the age of 13

8. Describe how the IIF will be secured:

Security plans have been written and certified. All persons with proper access rights are required to annually take Information Security training.

9. Describe plans for retention and desctruction on IIF:

Follow guidelines set forth in NRRS Schedule 3/3300-14 NASA Special Employment Programs Files

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 10SPER Special Personnel Records

Point of contact to whom a member of the public can address questions concerning this information system and the privacy concerns associated with it: Mike Wardeiner

Concur:	Concur:
Concurrence Credentials on File System Owner Date: 03/24/2009	Concurrence Credentials on File SHIRLEY A. ANDERSON Center Privacy Manager Date: 03/24/2009
Concur:	Approve:
Concurrence Credentials on File Teresa M. Fryer	BOBBY L. GERMAN
NASA Privacy Program Manager Date: 03/24/2009	NASA CIO Date

Document History

Date	Action	Message
06/22/09	Final approval by:Kevin Johnson	Signed by NASA's CIO, Bobby German on April 1, 2009. The PIA summary is posted on the internal and external Privacy Websites.
03/24/09	Submitted to NASA CIO by:Kevin Johnson	N/A
03/24/09	Submitted to Nasa Privacy Program Manager by:SHIRLEY ANDERSON	N/A
03/24/09	Submitted to Center Privacy Manage by:SHIRLEY ANDERSON	r N/A
03/24/09	Submitted to Application Owner by:SHIRLEY ANDERSON	LERCIP has been approved by Shirley Anderson
01/14/09	Delegated to:SHIRLEY ANDERSON	Shirley, Looks good to me. I didn't see any issues with the COPPA questions. I changed the NASA CIO to Bobby German for concurrence. Let me know if you have any other questions.
01/14/09	Delegated to:Teresa Fryer	Teresa - Please review a first try of the LERCIP PIA. I don't understand this Enterprise Architecture review. Also Q 39 and 41 we can't seem to figure out. What does that mean. Let me know your comments. Thanks for all your help.
12/10/08	Delegated to:SHIRLEY ANDERSON	Q 39 and Q 41 need to be addressed
12/03/08	Delegated to:SUSAN GOTT	Sue, I have delegated to you the PIA document that I started for LERCIP. You might be getting a call from Shirley Anderson regarding this. You don't need to do anything with this until you hear from Shirley.

An Enterprise Architecture review is required in accordance with NPR 2830.1