



Standard Operating Procedure

Review and Reducing Personally Identifiable Information (PII)

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Responsible Office: Office of the Chief Information Officer

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1	V.1.0	Initial	Dec 17, 2007
2	V.1.1	Administrative Corrections	Jan 09, 2008

Review and Reducing Personally Identifiable Information (PII)

Purpose

The purpose of this standard operating procedure (SOP) is to provide procedures for implementing the NASA Plan for Reviewing and Reducing Personally Identifiable Information, assuring that NASA retains only the minimum PII holdings required for operations and administration.

The SOP:

- Implements a procedure for eliminating the unnecessary use of PII
- Includes an explanation of roles and responsibilities.
- Presents the process for conducting an annual review of NASA PII holdings and progress toward reducing and eliminating unnecessary instances of PII.

As defined in NPR 1382.1, PII is any information about an individual maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history and information which can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information which is linked or linkable to an individual. For purposes of this procedure, PII is information, which when used either alone or combined with other information, can be used to trace and identify a specific person. PII is not limited to the use of SSNs. The term "PII" can be interchanged with other similar terms such as IIF, Information in Identifiable Form.

Scope

This SOP applies to the NASA Privacy Act Officer, the NASA Center Privacy Act Managers, and all NASA PII holders

NASA conducted a survey in 2006 that established a baseline inventory of systems and applications containing PII.

This procedure uses as a starting point data collected in 2006.

During 2007, NASA refined and revalidated the inventory, identified opportunities and formulated plans for reducing those holdings.

Beginning with the second quarter of fiscal year 2008, NASA will conduct an annual review of all of its PII holdings in any form. This includes digital information in information-technology systems or in any other form. PII holdings include both paper and electronic formats in any information system. As part of the annual review, NASA will validate or revalidate the need for its PII holdings.

References

- OMB M-06-16, Protection of Sensitive Agency Information

- OMB M-07-19, FY 2007 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Policy
- NASA NPD 1382.17G, NASA Privacy Policy
- NASA NPR 1382.1, NASA Privacy Procedural Requirements
- NASA NPR 1600.1, NASA Security Program Procedural Requirements
- NASA Plan for Reviewing and Reducing Personally Identifiable Information and Eliminating Unnecessary Use of Social Security Numbers (SSNs)

Roles and Responsibilities

The roles and responsibilities during the annual review of PII holdings are as follows:

- The NASA Privacy Act Officer:
 - Consolidates the reports on PII holdings submitted by the Center Privacy Act Managers
 - Analyzes the consolidated reports to find redundancies or questionable PII holdings, and methods of reducing them
 - Compiles NASA's annual PII Review and Reduction report by 1 July of each year
- The Center Privacy Act Managers:
 - By January 15 of each year, send tasking to their PII holders to review, revalidate, and report reduction progress for their current PII holdings, justifying any new holdings
 - Consolidate the reports from the PII holders
 - Analyze the consolidated reports of PII holdings to find redundancies or questionable holdings, and methods of reducing them
 - Submit a report to the NASA Privacy Act Officer by 31 March. The report contains the consolidated report of the Center's PII holding, a summary of the analysis, and a justification for each holding.
- PII Holders
 - Review all PII holdings during the second quarter of each fiscal year, to find ways of reducing them and to justify those that remain. (PII holdings include paper and microfilm as well as electronic records.)
 - Submit a report to the Center Privacy Act Manager with the justifications for any previously reported or new PII holdings, using Appendix A.

Process

No later than January 15:

- The Center Privacy Act Managers assign their PII holders the task of reviewing, revalidating, and reducing their current PII holdings and justifying any new holdings.

During January—March:

- PII holders review all PII holdings during the second quarter of each fiscal year, to find ways of reducing them and to justify those that remain. (PII holdings include paper and microfilm as well as electronic records.)
- PII holders submit a report to their Center Privacy Act Manager (or to the NASA Privacy Officer if they are not part of a Center). The report contains proposals for reducing their PII holdings as well as justifications for PII holdings that remain, whether they are new or were previously reported.

The template for the report is at Appendix A.

On or before 31 March:

- Center Privacy Act Managers consolidate the reports from their PII holders.
- Center Privacy Act Managers analyze the consolidated reports of PII holdings to find redundancies or questionable holdings, and methods of reducing them. Methods of reduction can include eliminating them, consolidating them, or setting time limits on retaining them.
- Center Privacy Act Managers submit their reports to the NASA Privacy Act Officer by 31 March. The reports contain the consolidated report of the Center's PII holding, a summary of the analysis, and a justification for each holding.

The template for the report is at Appendix A.

On or before 30 April:

- The NASA Privacy Act Officer consolidates the reports submitted by the Center Privacy Act Managers
- The NASA Privacy Act Officer analyzes the consolidated reports to find redundancies or questionable PII holdings, and methods of reducing them

On or before 1 July:

- The NASA Privacy Act Officer compiles NASA's annual PII Review and Reduction report by 1 July of each year

Contents of the Report on PII Holdings

Reports on PII holdings include the following information:

- Name of PII Holding
- Updated descriptions of each PII holding
- The method of storing each PII holding (for example, on a magnetic storage device, as a paper copy in a lockable file cabinet, on an optical disk, and so on)
- If the PII holding is on an information-technology system, the name of the system and number of its security plan, and, if applicable, the URL
- The source of the PII holding, such as the name and URL of an information-technology system
- Who uses the PII
- A justification for retaining and using the PII

- How long the PII is retained, and the associated NASA records retention schedule
- The impact of deleting the PII holding
- Whether this PII holding can be reduced and how
- Remarks (for example, special considerations, schedule for reductions, or any other information that is pertinent)

Appendix List

- Appendix A, NASA Personally Identifiable Information (PII) Data. The form is at the end of this document.

Approval


Jonathan Q. Pettus
Chief Information Officer

12/21/2008

Date

