
PIA Analysis Worksheet and Summary Template

The template for an information technology (IT) system Privacy Impact Assessment (PIA) Analysis Worksheet and Summary Template begins on the following page. The Template covers the four major categories of information required for inclusion into the PIA: system characterization, information sharing practices, Web site practices, and security controls.

NASA IT Privacy Impact Assessment (PIA) Analysis Worksheet

The PIA determines what kind of information in identifiable form (IIF), if any, is contained within a system, what is done with that information, and how that information is protected. Systems with IIF are subject to an extensive list of requirements based on privacy laws, regulations, and guidance.

Identifying Numbers (Use N/A for items that are Not Applicable)

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

Student Programs for Achievements in Careers and Education

Application Owner:

Michael Kincaid

(Person who is responsible for funding)

Phone Number: 281-483-6848 Email: michael.a.kincaid@nasa.gov

System Manager

Barbara Hammond, USRA

(Responsible for system technical operation)

Phone Number: 281-244-2037 Email: bhammond@sop.usra.edu

NASA Cognizant Official:

Janelle Holt

(NASA individual responsible for management of daily operations)

Phone Number: 281-244-1613 Email: jholt1@ems.jsc.nasa.gov

Activity/Purpose of Application:

Student Programs for Achievements in Careers and Education is aimed at expanding educational opportunities for students in aerospace engineering and the space sciences, as well as encouraging young students to stay in school and pursue careers in science, engineering, and business. USRA works cooperatively with the NASA Johnson Space Center (JSC) to manage this opportunity for disadvantaged students or students in need of encouragement and positive, nurturing role models.

Mission Program/Project Supported:

AE Education

IT Security Plan Number:

USRA/CASS IT Policies and Procedures

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

Center/Contractor: USRA/CASS

Street Address: 3600 Bay Area Blvd.

Building:

City Houston ST TX ZIP 77058

Privacy Act System of Records (SOR)

Number:

10-SPER

OMB Information Collection Approval Number and Expiration Date:

Other Identifying Number(s):

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
System Characterization and Data Categorization					
1	<p>Has/Have any of the major changes listed in the Comments column occurred to the system since April 2003 or the conduct of the last PIA?</p> <p>If yes, please check which change(s) have occurred.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Conversions <input type="checkbox"/> Anonymous to Non-Anonymous <input checked="" type="checkbox"/> Significant System Management Changes <input type="checkbox"/> Significant Merging <input checked="" type="checkbox"/> New Public Access <input type="checkbox"/> Commercial Sources <input type="checkbox"/> Internal Flow or Collection <input type="checkbox"/> New Interagency Use <input checked="" type="checkbox"/> Alteration in Character of Data
2	Does/Will the system contain Federal records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	If the system contains/will contain Federal records, under which disposition authority item in the NASA Records Retention Schedules or the General Records Schedules are/will the records be retained and disposed of or archived?			<input type="checkbox"/>	Schedule Item: 1; Item 32; Sub item A
4	Do the records in the system pertain to active programs/projects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5	Are the records Vital records for the organization?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6	<p>Are backup files (tapes or other media) being stored off-site?</p> <p>If yes, please indicate in the comment field where backups are located.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Backup storage location : _ <u>2200 Nasa Parkway Houston, Texas 77058</u> _____ _____ _____

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
System Characterization and Data Categorization					
7	<p>Does/Will the system <i>contain (store)</i> information in identifiable form (IIF) within any database(s), record(s), file(s) or Web site(s) hosted by this system?</p> <p>Note: 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.</p> <p>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 <i>Privacy Act</i>, 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 <i>Privacy Act</i> or other legislation.</p> <p>[Autofill all relevant questions with N/A.]</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Personal Information:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Date of birth <input checked="" type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video) <input checked="" type="checkbox"/> Driver's license <input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint) <input type="checkbox"/> Mother's maiden name <input type="checkbox"/> Vehicle identifiers (e.g., license plates) <input checked="" type="checkbox"/> Mailing address <input checked="" type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) <input type="checkbox"/> Medical records numbers <input checked="" type="checkbox"/> Medical notes <input checked="" type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) <input checked="" type="checkbox"/> Certificates (e.g., birth, death, and marriage) <input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other) <input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other) <input type="checkbox"/> Web Uniform Resource Locators (URL) <input checked="" type="checkbox"/> E-mail address <input checked="" type="checkbox"/> Education records <input type="checkbox"/> Military status and/or records <input type="checkbox"/> Employment status and/or records <input type="checkbox"/> Foreign activities and/or interests <input type="checkbox"/> Other: _____
8	<p>Indicate all the categories of individuals about whom IIF is or will be collected.</p>			<input type="checkbox"/>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Public citizens <input type="checkbox"/> Patients <input type="checkbox"/> Business partners/contacts (federal, state, local agencies) <input type="checkbox"/> Vendors/Suppliers/Contractors <input type="checkbox"/> Other

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
System Characterization and Data Categorization					
9	<p>Are records on the system (or will records on the system be) retrieved by one or more data elements?</p> <p>Note: If yes, specify in the Comments column data elements will be used in retrieving the records (i.e., using a record number, name, social security number, or other data element or record locator methodology). If the category of personal information is not listed, please check "Other" and identify the category.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Personal Information:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Name <input type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video) <input type="checkbox"/> Driver's license <input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint) <input type="checkbox"/> Mother's maiden name <input type="checkbox"/> Vehicle identifiers (e.g., license plates) <input type="checkbox"/> Mailing address <input type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) <input type="checkbox"/> Medical records numbers <input type="checkbox"/> Medical notes <input type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) <input type="checkbox"/> Certificates (e.g., birth, death, and marriage) <input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other) <input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other) <input type="checkbox"/> Web Uniform Resource Locators (URL) <input type="checkbox"/> E-mail address <input type="checkbox"/> Education records <input type="checkbox"/> Military status and/or records <input type="checkbox"/> Employment status and/or records <input type="checkbox"/> Foreign activities and/or interests <input type="checkbox"/> Other: _____
10	<p>Are/Will records on 10 or more individuals containing IIF [be] maintained, stored or transmitted/passed through this system?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11	<p>Is the system (or will it be) subject to the Privacy Act?</p> <p>Note: If the answer to questions 7, 9, and 10 were yes, the system will likely be subject to the <i>Privacy Act</i>. System owners should contact their Center PAM for assistance with this question if they are uncertain of the applicability of the <i>Privacy Act</i>.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Autofill "yes" when yes is marked for 7 and 9; "no," if 7 and 9 are marked "no."</p>
12	<p>Has a Privacy Act System of Record (SOR) Notice been published in the Federal Register for this system?</p> <p>Note: If no, explain why not in the Comments column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> <input type="checkbox"/> No IIF is contained in the system. <input type="checkbox"/> IIF is in the system, but records are not retrieved by IIF. <input type="checkbox"/> Should have published an SOR, but was unaware of the requirement. <input type="checkbox"/> System is required to have an SOR but is not yet procured or operational. <input checked="" type="checkbox"/> Other: <u>NASA 10SPER</u>
13	<p>If a SOR Notice has been published, have major changes to the system occurred since publication of the SOR?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Information Sharing Practices					
14	<p>Is the IIF in the system voluntarily submitted (or will it be)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
15	<p>Does/Will the system <i>collect</i> IIF directly from individuals?</p> <p>Note: If yes, identify in the Comments column the IIF the system collects or will collect directly from individuals. If the category of personal information is not listed, please check "Other" and identify the category.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as #7
16	<p>Does/Will the system <i>collect</i> IIF from other resources (i.e., databases, Web sites, etc.)?</p> <p>Note: If yes, specify the resource(s) and IIF in the Comments column.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Web based surveys: Name, Address, Phone, Email Address
17	<p>Does/Will the system <i>populate</i> data for other resources (i.e., do databases, Web sites, or other resources rely on this system's data)?</p> <p>Note: If yes, specify resource(s) and purpose for each instance in the Comments column.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____ <input type="checkbox"/> Resource: _____
18	<p>Does/Will the system <i>share</i> or <i>disclose</i> IIF with agencies external to NASA, or other people or organizations outside NASA?</p> <p>Note: If yes, specify with whom and for what purposes, and identify which data elements in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>With whom and for what purposes:</p> <input checked="" type="checkbox"/> <u>USRA Headquarters Office, Columbia, Maryland – USRA administers the web site.</u> _____ <input type="checkbox"/> _____ <input type="checkbox"/> _____ <input type="checkbox"/> _____ <input type="checkbox"/> _____

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
19	<p>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?</p> <p>If yes, indicate in the Comments column internal or external and the system(s) with data which are matched.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Location of other systems involved in matching:</p> <p><input type="checkbox"/> Internal NASA</p> <p><input type="checkbox"/> External to NASA</p> <p>Other systems involved:</p> <p>_____</p> <p>_____</p> <p>If answered "No," auto fill 20 with N/A.</p>
20	<p>If data matching activities will occur, will the IIF be de-identified, aggregated, or otherwise made anonymous?</p> <p>Note: If yes, please describe this use in the Comments column.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p><input type="checkbox"/> De-identified</p> <p><input type="checkbox"/> Aggregated</p> <p><input type="checkbox"/> Other</p>
21	<p>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)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The system is only used for one purpose.</p>
22	<p>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)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A process will be established to notify and obtain consent from the individuals whose IIF is in the system when major changes occur to the system. This system will be in place by 3/1/06.</p>
23	<p>Is there/Will there be a process in place for individuals to choose how their IIF data is used?</p> <p>Note: If yes, please describe the process for allowing individuals choice in the Comments column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A process will be established for individuals to choose how their IIF data is used. This system will be in place by 3/1/06.</p>
24	<p>Is there/Will there be a complaint process in place for individuals who believe their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate?</p> <p>Note: If yes, please describe briefly the notification process in the Comments column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>There will be a complaint process in place for individuals who believe their IIF has been inappropriately obtained, used, or disclosed. This system will be in place by 3/1/06.</p>
25	<p>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 relevancy?</p> <p>Note: If yes, please describe briefly the review process in the Comments column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Process: A process will be in place by 6/30/06. _____</p> <p>_____</p> <p>_____</p>

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
26	<p>Are there/Will there be rules of conduct in place for access to IIF on the system?</p> <p>Note: If yes, identify in the Comments column all users with access to IIF on the system and for what purposes they use the IIF.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Users <input checked="" type="checkbox"/> Administrators <input type="checkbox"/> Developers <input type="checkbox"/> Contractors For what purposes: <input checked="" type="checkbox"/> Administration of the Program <input type="checkbox"/> _____ <input type="checkbox"/> _____ <input type="checkbox"/> _____
27	<p>Is there a process in place to log routine and non-routine disclosures and/or unauthorized access?</p> <p>If yes, check in the Comments column which kind of disclosures are logged.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disclosures logged: <input type="checkbox"/> Routine <input type="checkbox"/> Non-routine <input type="checkbox"/> Public Internet _____
Web site Host – Question Sets					
28	<p>Does/Will the system host a Web site?</p> <p>Note: If yes, identify what type of site the system hosts in the Comments column. If no, check "No" for all remaining questions in the "Web Site Host Question Sets" section and answer questions starting with the "Administrative Controls" section beginning with question 42.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Type of site: <input checked="" type="checkbox"/> <u>Public Internet SSL secure and password protected.</u> <input type="checkbox"/> Internal NASA _____ <input type="checkbox"/> Both _____
29	<p>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.)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The website is, but the IIF is under a secure server and is password protected.
30	<p>Is the Agency Web site privacy policy statement posted (or will it be posted) on the Web site?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A USRA privacy policy is posted on the website.
31	<p>Is the Web site's privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)?</p> <p>Note: If no, please describe in the Comments column your timeline to implement P3P requirements for this system.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Implementation Plan: <u>In work</u> _____ _____

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
32	<p>Does the Web site employ (or will it employ) persistent tracking technologies?</p> <p>Note: If yes, identify types of cookies in the Comments column. If persistent tracking technologies are in place, please indicate the official who authorized the use of the persistent tracking technology.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Session Cookies <input type="checkbox"/> Persistent Cookies <input type="checkbox"/> Web bugs <input type="checkbox"/> Web beacons <input type="checkbox"/> Other (Describe): _____ Authorizing Official: _____ Authorizing Date: _____
33	<p>Does/Will the Web site collect or maintain personal information from or about children under the age of 13?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>If marked "No," autofill "N/A" in next question.</p>
34	<p>If the Web site does/will collect or maintain personal information from or about children under the age of 13, please indicate what information and how the information is collected.</p>			<input checked="" type="checkbox"/>	<input type="checkbox"/> Actively directly from the child <input type="checkbox"/> Passively through cookies <input type="checkbox"/> Both of the above What Information collected: _____ _____ _____
35	<p>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.</p> <p>Note: If yes, also identify the non-NASA organizations in the comments field</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Information is shared with: _____ _____ _____ <p>If "no," autofill "N/A" in items 36 & 37.</p>
36	<p>If the Web site does/will collect or maintain personal information from or about children under the age of 13, specify in the comments field what method is used for obtaining parental consent.</p>			<input checked="" type="checkbox"/>	Method used for obtaining parental consent (please check all that apply) <input type="checkbox"/> No consent is obtained <input type="checkbox"/> Simple email <input type="checkbox"/> email accompanied by digital signature <input type="checkbox"/> signed form from the parent via postal mail or facsimile <input type="checkbox"/> accepting and verifying a credit card number in connection with a transaction <input type="checkbox"/> taking calls from parents, through a toll-free telephone number staffed by trained personnel

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
37	<p>Does/Will the Web site collect IIF electronically from any individuals?</p> <p>Note: If yes, identify what IIF the system collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Personal Information:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Date of birth <input checked="" type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video) <input type="checkbox"/> Driver's license <input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint) <input type="checkbox"/> Mother's maiden name <input type="checkbox"/> Vehicle identifiers (e.g., license plates) <input checked="" type="checkbox"/> Mailing address <input checked="" type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) <input type="checkbox"/> Medical records numbers <input type="checkbox"/> Medical notes <input type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) <input type="checkbox"/> Certificates (e.g., birth, death, and marriage) <input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other) <input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other) <input type="checkbox"/> Web Uniform Resource Locators (URL) <input checked="" type="checkbox"/> E-mail address <input type="checkbox"/> Education records <input type="checkbox"/> Military status and/or records <input type="checkbox"/> Employment status and/or records <input type="checkbox"/> Foreign activities and/or interests <input type="checkbox"/> Other: _____
38	<p>Does/Will the Web site provide a PDF form to be completed with IIF from any individuals and then mailed or otherwise provided to NASA?</p> <p>Note: If yes, identify what IIF the PDF form collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Personal Information:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Date of birth <input checked="" type="checkbox"/> Social Security Number (or other number originated by a government that specifically identifies an individual) <input type="checkbox"/> Photographic identifiers (e.g., photograph image, x-rays, and video) <input type="checkbox"/> Driver's license <input type="checkbox"/> Biometric identifiers (e.g., fingerprint and voiceprint) <input type="checkbox"/> Mother's maiden name <input type="checkbox"/> Vehicle identifiers (e.g., license plates) <input checked="" type="checkbox"/> Mailing address <input checked="" type="checkbox"/> Phone numbers (e.g., phone, fax, and cell) <input type="checkbox"/> Medical records numbers <input type="checkbox"/> Medical notes <input type="checkbox"/> Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) <input type="checkbox"/> Certificates (e.g., birth, death, and marriage) <input type="checkbox"/> Legal documents or notes (e.g., divorce decree, criminal records, or other) <input type="checkbox"/> Device identifiers (e.g., pacemaker, hearing aid, or other) <input type="checkbox"/> Web Uniform Resource Locators (URL) <input checked="" type="checkbox"/> E-mail address <input type="checkbox"/> Education records <input type="checkbox"/> Military status and/or records <input type="checkbox"/> Employment status and/or records <input type="checkbox"/> Foreign activities and/or interests <input type="checkbox"/> Other: _____

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
39	<p>Does/Will the Web site <i>share</i> IIF with organizations external to NASA, or other people or organizations outside NASA?</p> <p>Note: If yes, specify with whom and for what purposes.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>With whom and for what purposes:</p> <p><input type="checkbox"/> <u>USRA Headquarters Office, Columbia, Maryland – USRA administers the web site.</u></p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p> <p><input type="checkbox"/> _____</p>
40	<p>Are rules of conduct in place (or will they be in place) for access to IIF on the Web site?</p> <p>Note: If yes, identify in the Comments column all categories of users with access to IIF on the system, and for what purposes the IIF is used.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><input checked="" type="checkbox"/> Users</p> <p><input checked="" type="checkbox"/> Administrators</p> <p><input checked="" type="checkbox"/> Developers</p> <p><input checked="" type="checkbox"/> Contractors</p> <p>http://www.sop.usra.edu/epo/privacy_policy.html</p> <p>For what purposes:</p> <p><input checked="" type="checkbox"/> <u>Users-students can view their personal data</u></p> <p><input checked="" type="checkbox"/> <u>Administrators-need access to personal information to manage the program</u></p> <p><input checked="" type="checkbox"/> <u>Developers-need access to manage the database</u></p> <p><input checked="" type="checkbox"/> <u>Contractors-need access to personal information to administer the program</u></p>
41	<p>Does (or will) the Web site contain links to sites external to the Center that owns and/or operates the system?</p> <p>Note: If yes, note in the Comments column whether the system provides a disclaimer notice for users that follow external links to Web sites not owned or operated by the Center.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p><input type="checkbox"/> Disclaimer notice for all external links</p> <p>Website is external to the Center.</p>
Administrative Controls					
42	<p>Have there been major changes to the system since it was last certified and accredited?</p> <p>Note: If the system is under development and not yet certified and accredited at the time of this PIA, please describe in the Comments column the plan and timeline for conducting a certification and accreditation (C&A) for this system.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
43	<p>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?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Formal training is planned for the October-November timeframe.</p>

No.	Privacy Question Sets	User Response			Comments
		Yes	No	N/A	
44	<p>Who has /will have access to the IIF on the system?</p> <p>Note: Check all that apply in the Comments column.</p>				<input checked="" type="checkbox"/> Users – Only their own IIF <input checked="" type="checkbox"/> Administrators – 2 FTE <input checked="" type="checkbox"/> Developers - 2 <input checked="" type="checkbox"/> Contractors - 7 <input type="checkbox"/> Other
45	<p>If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
46	<p>Are methods in place to ensure that access to IIF is restricted to only those required to perform their official duties?</p> <p>Note: If yes, please specify method(s) in the Comments column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Records are locked in file cabinets or in secured rooms with access limited to those whose official duties require access.
47	<p>Are there policies or guidelines in place for the retention and destruction of IIF within the application/system?</p> <p>Note: If yes, please provide some detail about these policies/practices in the Comments column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	USRA/CASS IT Policies and Procedures.
Technical Controls					
48	<p>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)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
49	<p>Are any of the password controls listed in the Comments column in place (or will they be)?</p> <p>Note: Check all that apply in the Comments column.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Passwords expire after a set period of time. <input checked="" type="checkbox"/> Accounts are locked after a set period of inactivity. <input type="checkbox"/> Minimum length of passwords is eight characters. <input type="checkbox"/> Passwords must be a combination of uppercase, lowercase, and special characters. <input type="checkbox"/> Accounts are locked after a set number of incorrect attempts.
50	<p>Is there (or will there be) a process in place to monitor and respond to privacy and/or security incidents?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Physical Controls					
51	<p>Are physical access controls in place (or will they be)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
- END -					

PIA Analysis Worksheet
Contact Information

Signature of NASA Cognizant Official

Date

Janelle Holt

Student Employment Specialist

Print Name

Title/Position

JSC Office of Education/Higher Education and Student Employment Programs

Center and Office/Department

2101 NASA Parkway/

Street Address

Attention Mail code AE2

Street Address

Houston, TX 77058

City, State and Zip Code

281-244-1613

Phone Number

281-483-3789

Fax Number

Please go to the next page and complete the PIA Summary. This Summary will be made publicly available at <http://www.NASA.gov/pia>.

Privacy Impact Assessment (PIA) Summary

Date of this Submission (MM/DD/YYYY): 10/4/05

NASA Center: Johnson Space Center

Application Name: Student Programs For Achievements in Careers and Education

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)?

The Student Programs for Achievements In Careers and Education application collects, maintains, and disseminates information in identifiable format.

Mission Program/Project Supported: AE Education Office

Identifying Numbers (Use N/A, where appropriate)

Privacy Act System of Records Number: 10-SPER

OMB Information Collection Approval Number and Expiration Date:

Other Identifying Number(s):

Description

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

The system is used by USRA to work cooperatively with the NASA Johnson Space Center (JSC) in managing the cooperative agreement for a work/study opportunity for disadvantaged students or students in need of encouragement and positive, nurturing role models. The system collects information on applicants necessary for screening and employment purposes.

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 system collects and uses the following information:

Students Names (IIF-Voluntary) – used to identify the students throughout the program. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
Date of Birth (IIF-Voluntary) – used to verify that students are eligible to participate in the program. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
Social Security Number - (IIF-Voluntary) – used for employment purposes. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
Mailing Address - (IIF-Voluntary) – used for employment purposes and send program related material to participants. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
Phone Numbers - (IIF-Voluntary) – used for employment purposes and emergency contact when students are working on-site. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
Medical Notes – (IIF – Voluntary) – used to ensure the well-being of the students while they are working on-site.
Email Address – (IIF – Voluntary) – used to contact students during the pre-employment process and maintain contact with alumni. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
Education Records - (IIF-Voluntary) – used to ensure that students are academically eligible to participate in the program. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
Financial Account Information – (IIF- Voluntary) – used for employment payroll purposes. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.

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

All the collected information stated above is necessary for the successful administration of the program.

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

Explained in question number 2.

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

The IIF is shared with USRA alone and USRA in turn, shares IIF with USRA Headquarters office in Columbia, Maryland strictly for employment purposes. USRA does not share IIF with anyone outside of this organization.

6. Describe how the IIF will be obtained, from whom it will be collected, what the suppliers of 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, etc.). Describe any opportunities for consent provided to individuals regarding what information is collected and how the information will be shared.

The IIF is obtained through online and paper forms from high school juniors and seniors in the Houston area who wish to participate in the Work-Study program. Applicants are given a written copy of the USRA Privacy Policy and told how their IIF will be used during the employment process.

7. State whether 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 is collected from children under the age of 13.

8. Describe how the IIF will be secured.

All access to IIF is SSL secure and has a password protected connection.

9. Describe plans for retention and destruction of IIF.

All electronic IIF is stored in a secure manner. Once the data has been deemed unnecessary to maintain, it will be destroyed.

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.

Resultant Decisions:

A process will be established to notify and obtain consent from the individuals whose IIF is in the system when major changes occur to the system. This system will be in place by 3/1/06.

A periodic review process of IIF contained in the system will be established to ensure the data's integrity, availability, accuracy, and relevancy. This system will be in place by 6/30/06.

Rules of Conduct can be found on our website at http://www.sop.usra.edu/epo/privacy_policy.html

Identify a point of contact to whom a member of the public can address questions concerning this information system and the privacy concerns associated with it: Barbara Hammond

Janelle Holt

NASA Cognizant Official/Student Employment Specialist

Date _____

Concur:

Concur:

Herbert J. Babineaux, Jr.

Center Privacy Act Manager

Jean E. Carter

Center Chief Information Officer

Date _____

Date: _____

Concur:

Approved for Publication:

Patti F. Stockman

NASA Privacy Act Officer

Patricia L. Dunnington

Chief Information Officer

Date: _____

Date: _____