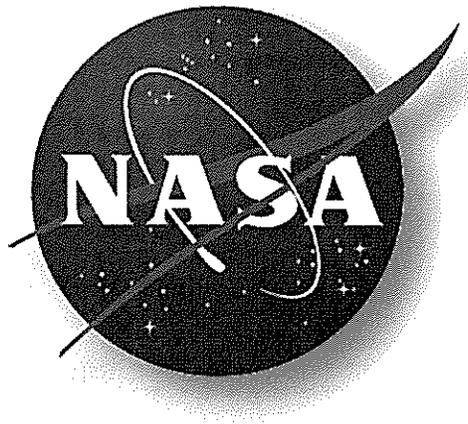


**National Aeronautics and Space Administration
(NASA)**

**Fiscal Year (FY) 2009 Report on
Reviewing and Reducing
Personally Identifiable Information (PII)
And
Eliminating Unnecessary Use of
Social Security Numbers (SSNs)**



October 2009

NASA Fiscal Year (FY) 2009 Personally Identifiable Information (PII) Review and Reduction Report to the Office of Management and Budget (OMB)

Overview

This report provides the results of the National Aeronautics and Space Administration (NASA) annual review of personally identifiable information (PII) holdings in an effort to eliminate the unnecessary collection and use of PII, including Social Security Numbers (SSNs), as required by OMB Memorandum M-07-16, "Safeguarding Against and Responding to the Breach of Personally Identifiable Information." As required by OMB Memorandum M-07-16, Agencies are to develop a schedule by which they will periodically review their PII holdings.

In response to the OMB memorandum, NASA developed a plan that provides for the ongoing identification, review, and reduction of NASA holdings of PII to ensure only the minimum PII holdings needed for NASA operations, and administration are retained. This plan also includes NASA's efforts for eliminating the unnecessary use of Social Security Number (SSN) within systems and programs to identify instances where the collection or usage is not necessary and can be eliminated. Standard Operating Procedures (SOP) were also developed to ensure consistent review and reduction of PII activities and reporting procedures were conducted in all 12 NASA Centers. These documents are published on the NASA Privacy Web site at <http://www.nasa.gov/privacy/index.html>.

Since PII holdings can be stored electronically, in non-electronic (paper form), or any other media format, this annual review attempted to find redundancies or questionable holdings, and methods of reducing them. Possible methods of reduction included elimination, consolidation, or setting time limits on retention periods. The purpose of the annual review is to:

- Reduce the amount of PII holdings to a minimum, yet allow NASA to function efficiently;
- Eliminate the use of SSN in instances where the collection and holding of SSN is not necessary for the performance of Agency functions; and
- Establish a control process to ensure PII gathering initiatives are properly reviewed for functional requirements, and that continuing PII holdings are reviewed for appropriateness and accuracy.

This report is based on NASA's Fiscal Year (FY) 2009 PII Review and Reduce efforts, and includes the Agency's efforts to eliminate the unnecessary use of SSNs.

Current Initiatives

Review of Current PII Holdings

NASA continues to be vigilant towards reducing the collection and usage of PII throughout the Agency. This year, the Agency made a concerted effort to focus on discovering PII which may be contained in paper form, as well as, electronic form. In the second quarter of FY09 the Center

Privacy Managers at each NASA Center tasked owners of information systems, applications, or other data holdings which contain PII to complete the annual PII review and reduction analysis in accordance with NASA ITS-SOP-0046A, Review and Reduce Personally Identifiable Information (PII) and Eliminate the Unnecessary Use of SSN Annual Reporting Procedures. As a result of this annual review, the following reduction of PII initiatives were reported:

- Each Center Privacy Manager reviewed and validated the PII holdings identified on the Master PII List (MPIIL), identifying applications/information systems containing PII that have been decommissioned and discovering other PII holdings that were added to the list.
- The Center Privacy Managers looked at possible areas where paper forms of PII could be eliminated and replaced by electronic reports, affording more secure means of protecting the PII.
- Center Privacy Managers were involved in reviews of new applications, information systems, and/or electronic information collection systems (surveys) that are in the planning phase and will collect PII. A review of the PII data elements being collected was conducted to ensure that the collection of PII data elements is kept to a minimum in order to prevent any additional unnecessary PII holdings.

Review and Reduction of PII Holdings Consolidated Results

The FY09 annual review and reduction of PII holdings identified 167 systems that store and process PII, with adequate justification to retain 153 out of the 167 systems. Several systems were consolidated as a result of Agency level systems coming online. In addition, there were 18 systems that were decommissioned in FY09 and 8 additional systems that are slated to be decommissioned or consolidated FY10.

The following table provides a consolidated overview of the results of the FY09 annual review and reduction of PII holdings and eliminating unnecessary use of SSN:

Systems Containing PII	Systems Containing PII that is Justified	Systems Containing PII Consolidated in FY09	Systems De-commissioned in FY09	Systems where SSN use is being Replaced or Eliminated in FY09 or FY10	Systems Scheduled to be De-commissioned or Consolidated in FY10
167	155	12	18	3	8

Table 1 Results of the FY09 PII Review and Reduction of PII Holdings Analysis

Eliminating Unnecessary Use of SSN

It is NASA's objective to maximize the protection of SSNs when its use is required and eliminate its use when it is not necessary. During the FY09 Review and Reduction of PII and Elimination of SSN, Center Privacy Managers validated the need for use of SSNs with information system owners, ensuring that its use was either required by statute, external requirement or for compelling business needs. As a result of this annual review of the use of SSNs, the following elimination of SSN initiatives were reported:

- Universal Uniform Personal Identification Code (UUPIC) was used as a replacement for SSN in one Agency level information system and another will replace SSN with UUPIC beginning of FY10.
- For those applications and information systems that still require the use of SSN, IT Security teams will ensure that control mechanisms are in place or planned for the protection of SSN (e.g. suppressing visibility of SSN on screen, in reports, or encryption usage via transmission, etc.).
- Working with Center Forms Managers, each Center Privacy Manager developed a plan for identifying existing and new forms that use SSN. The plan included the following:
 - Timeline for conducting review of all existing forms with the Center Forms Manager to identify those forms that collect SSN.
 - Timeline for reviewing forms that use SSN with the forms owner to identify those forms where SSN can be truncated or masked or replaced by UUPIC.
 - For those forms where the forms owner indicates SSN is no longer needed, ensure the owner communicates to Center personnel to no longer use SSN on the form until the form can be revised.
 - Identify process and timeline to revise those forms where SSN can be truncated, masked, or replaced.
 - Document justification for continued use of SSN on forms still requiring the use of SSN on the MPIL.
 - Timeline for implementing a process with the Center Forms Manager to review all new forms in development to ensure SSN is not used or there is justification for the use of SSN on the form.

Privacy Training and Awareness Initiatives

The following privacy awareness and training initiatives were conducted during FY09:

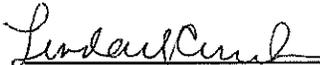
- An agency-level Privacy Awareness Outreach Campaign was conducted in April 2009 to reinforce the importance of protecting PII properly and reducing holdings of PII wherever possible.
- Each NASA Center, using the materials developed at the agency level, conducted their own Privacy Awareness Outreach Campaigns at the Center level.
- Privacy training, including employee's responsibilities regarding protection of PII, was incorporated into the annual basic IT security awareness training.
- Privacy training for Managers was developed to train Managers on their responsibilities regarding protection of PII.

- All PII incidents are reviewed for lessons learned and follow-on training conducted to prevent any similar future occurrences.

Summary

NASA has already taken a very large step forward in its efforts to review and reduce its PII holdings and to eliminate the unnecessary use of SSN. NASA continues to work diligently towards developing and implementing various policies, procedures, tools, and data identification methods to help ensure the protection of all forms of PII across the Agency. Through an Agency-wide Privacy Awareness Outreach Campaign, a maturing data breach reporting process, and the Center Privacy Managers continued engagement at the Center level, the Agency continues to display its commitment towards the protection and reduction of PII and eliminating the unnecessary use of SSN. NASA's objective is to reduce the risk to the Agency as a whole as well as NASA personnel and the members of the public who interact with the Agency.

Approval



Linda Y. Cureton
Chief Information Officer and
Senior Agency Official for Privacy

11/6/09

Date