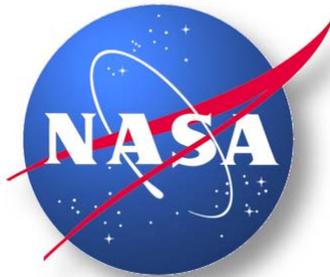


**National Aeronautics and Space Administration
(NASA)**

**Fiscal Year (FY) 2011 Report on
Reviewing and Reducing
Personally Identifiable Information (PII)
And
Eliminating Unnecessary Use of
Social Security Numbers (SSNs)**



October 14, 2011

NASA Fiscal Year (FY) 2011 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 SSNs within systems and programs to identify instances where the collection or usage is not necessary and can be eliminated. Information Technology Security (ITS) Handbooks (HBKs) were updated and developed to ensure that consistent review and reduction of PII activities and reporting procedures were conducted at 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 paper format, or by other methods, this annual review attempted to find redundancies and questionable holdings, and determine applicable methods of reducing the PII holdings. Possible methods of reduction included elimination, consolidation, suppressing visibility, and encryption. 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 SSNs in instances where the collection and holding of SSNs are not essential for the performance of Agency functions; and
- Establish a control process to ensure PII gathering initiatives are properly reviewed for functional requirements and that obligatory PII holdings are reviewed for appropriateness and accuracy.

This report is based on NASA’s Fiscal Year (FY) 2011 Privacy Review Action item, 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. In FY11 the Center Privacy Managers (CPMs) at each NASA Center tasked owners of information collections with Eliminating Unnecessary Use of SSN. NASA’s objective is to maximize the protection of SSNs when its use is required and fully justified, and eliminate its use when it is not necessary. For the FY11 Privacy Review Action, CPMs validated the need for use of SSNs with information system owners, ensuring that its use was either required by statute, external requirement, or for established business needs. As a result of this annual review, the following eliminations of SSN usage were reported:

- Each CPM reviewed and validated the PII holdings identified on the Master Privacy Information Inventory (MPII) list, identifying information systems containing PII that have been decommissioned and discovering other PII holdings that were added to the list.
- The CPMs looked at possible areas where paper forms of PII could be eliminated and replaced by electronic reports, affording more secure means of protecting PII.
- CPMs were involved in reviews of new applications, information systems, and/or electronic information collection systems (surveys) that are in the planning phase which 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 FY11 annual review and reduction of PII holdings identified 295 collections of PII (this includes electronic and non-electronic holdings), with justification to retain all of the 295 collections. In addition, there were 7 systems that were decommissioned in FY11 and 9 additional systems that are slated to be decommissioned or consolidated in FY12.

The following table provides a consolidated overview of the results of the FY11 annual review and reduction of PII holdings and eliminating unnecessary use of SSN:

Number of Reported Collections Containing PII	Number of Reported Collections Where PII is Justified	Systems Containing PII Decommissioned in FY11	Systems Containing PII Consolidated in FY11	Collections ¹ where SSN use is being Replaced or Eliminated in FY12 or FY13	Systems Scheduled to be Decommissioned or Consolidated in FY12
295	295	7	1	34	9

Table 1: Results of the FY11 PII Review and Reduction of PII Holdings Analysis

Eliminating Unnecessary Use of SSN

NASA’s objective is to maximize the protection of SSNs when its use is required and fully justified, and eliminate its use when it is not necessary. For the FY11 Privacy Review

¹ A non-electronic form collection, or a collection in a system.

Action, CPMs validated the need for use of SSNs with information system owners, ensuring that its use was either required by statute, external requirement, or for established business needs. As a result of this annual review, the following elimination of SSN usage were reported:

- CPMs provided a review status of their Center's forms to identify those forms that use SSNs. They validated with the form owner the need for, or elimination of, the SSN field(s) on forms.
- Working with Center Forms Managers, each CPM followed their plan for identifying existing and new forms that use SSNs. In FY11, CPMs continued to work with forms management personnel to ensure its execution and monitor the development of new forms.

Privacy Training and Awareness Initiatives

The following privacy awareness and training initiatives were conducted during FY11:

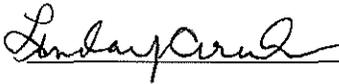
- A Face-to-Face meeting was held in August 2011 with the NASA Privacy Programs Manager and the CPMs to address key privacy issues and review current and newly proposed privacy practices. Topics included:
 - The privacy program moving forward and the update to the NASA Privacy Policy based on the *Best Practices: Elements of a Federal Privacy Program* sponsored by the Federal CIO Council, Privacy Committee put out in June of 2010.
 - A discussion on the basics of privacy law and requirements at NASA. Following this session, an industry expert on the Children's Online Privacy Protection Act (COPPA) provided an executive briefing.
 - A progress report on the work towards updating the NASA PIA systems in the Sensitive Unclassified Information Management System (SUIIMS).
 - Breach Response Team Training that included scenarios relating to each step of the Breach Response process. The process was updated based on the findings from the FY10 "NASA Breach 2010" tabletop exercise and enhancements through on-going lessons learned.
- The NASA Privacy Program Manager continues holding monthly video teleconference meetings with CPMs to provide an enriched ongoing learning and collaborative environment enhanced with invited speakers, interactive presentations, issue reviews, and resolution sharing.
- Additional enhancements to NASA's Privacy community include collaborative environment SharePoint's continued use. SharePoint allows for better communications to promote shared lessons learned, queries, postings, and solution developments in a manner that affords overall Privacy community benefits.

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 SSNs. NASA continues to work diligently toward developing and implementing various policies, procedures, tools, and data identification methods to help ensure the protection of all forms of PII across the Agency. Updates to privacy documents and techniques are moving forward faster than ever thanks to consistent improvements in communication amongst the CPMs. Sharing of best practices derived from each Center allows the most efficient and effective procedures to be put into place. The CPMs'

continued engagement with Center and Agency level initiatives displays their commitment towards the protection of PII and the elimination of the unnecessary usage of SSNs. 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 entrust NASA with their information.

Approval



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

10/14/11

Date