

NASA Plan

For Reviewing and Reducing

Personally Identifiable Information (PII)

And

Eliminating Unnecessary Use of

Social Security Numbers (SSNs)

ITS-Plan 1382-1
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1. Purpose

As required by the Privacy Act and Office of Management and Budget (OMB) Memorandum M-07-16, the National Aeronautics and Space Administration (NASA) is required to 1) review all current Personally Identifiable Information (PII) holdings and ensure such holdings are accurate, relevant, timely, and complete; and 2) reduce current PII holdings to the minimum necessary for the proper performance of the documented NASA function.

This plan provides for ongoing identification, review, and reduction of NASA holdings of PII as defined in NASA Procedural Requirement (NPR) 1382.1 to assure that only the minimum PII holdings required for NASA operations and administration are retained. Implementation of the plan will assure that PII collected and maintained by NASA is only that which is relevant and necessary to accomplish a purpose of the Agency, as required by statute or Executive Order of the President as specified in NPR 1382.1. This document also includes NASA's plan for eliminating unnecessary use of Social Security Numbers (SSNs).

In addition to meeting the OMB requirements, NASA's objective is to reduce the risk to the Agency as a whole caused by a breach as well as to NASA personnel and the members of the public who interact with the Agency. The reduced PII holdings and elimination of SSNs where not mandatory will help minimize the risk of a PII breach and its potential harm to individuals. The PII holdings review requirement is not limited to information systems but includes PII holdings such as electronic records on removable storage media and individual workstations or in hard copy or microfilm files.

2. Applicability

This plan is applicable to NASA Headquarters and Centers, including Component Facilities and Technical and Service Support Centers. To the extent specified in their respective contracts or agreements, it applies to the NASA Jet Propulsion Laboratory (JPL), other contractors, grant recipients, or parties to agreements, to the extent that they maintain PII, including SSNs, on NASA's behalf.

3. References

- a. OMB M-07-16, Safeguarding Against and Responding to the Breach of Personally Identifiable Information, May 22, 2007
- b. OMB M-09-29, FY 2009 Reporting Instructions for the Federal Information Security Management Act (FISMA) and Agency Privacy Management, August 20, 2009
- c. OMB M-10-15, FY 2010 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management, April 21, 2010
- d. OMB M-11-33, FY 2011 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management, September 14, 2011
- e. NASA Procedural Directive (NPD) 1382.17, NASA Privacy Policy
- d. NASA Procedural Requirement (NPR)1382.1, NASA Privacy Procedural Requirements

e. NASA IT Security Handbook ITS-HBK-1382.03-02, Privacy Risk Management and Compliance: Review and Reduce Personally Identifiable Information (PII) and Eliminate the Unnecessary Use of SSN Annual Reporting Procedures.

4. Requirement

4.1 Review and Reduction of PII

The objectives of the annual Review and Reduction of PII plan at NASA are to identify current data sources containing PII, review the use of SSN and other PII to reduce its collection and storage, recommend modifications to business processes and operations to protect PII, and increase employee awareness of PII issues, policies, and procedures.

4.1.1 Current Accomplishments

The following summarizes the actions to date that NASA has accomplished towards the objectives of this annual review and reduction of PII plan:

a. FY 2011 Accomplishments. In 2011, the Agency substantially increased the accuracy and capabilities of our existing Privacy Information Inventory and tracking tool (Master Privacy Information Inventory (MPII) mechanism), and updated the Agency policy to ensure CPMs continuously update the MPII year-round. This supports continuous review, reduce, and tracking and maintains an up to date inventory and status of holdings of PII and SSN (ITS-HBK-1382.03-02) year round. The results of the FY 2011 analysis were published in the NASA FY 2011 Report on Reviewing and Reducing PII and Eliminating the Unnecessary Use of SSNs.

- Additional actions in 2011 include designation of funds by the Agency to support the redesign of the existing Electronic Privacy Impact Assessment (PIA) System which will merge with and fully integrate the MPII. This system improves overall efficiency in tracking “review and reduce” activities while reducing man-hours previously required to conduct separate manual analysis at regular intervals. This investment is specifically designed to dramatically improve the annual review and reduce PII and SSN processes. These enhancements will enhance the Privacy Program overall.

b. FY 2010 Accomplishments. In 2010, the Agency focused on achieving a complete and accurate PII holdings inventory. This year also focused on the collection of PII in Agency forms, in both paper and electronic format. The results of this analysis were published in the NASA FY 2010 Report on Reviewing and Reducing PII and Eliminating the Unnecessary Use of SSNs.

- Initiated Privacy Information Inventory tracking and inventory systems consolidation initiative with the intent of improving overall year round inventory tracking through checks and balances with collections, PIAs and System of Record Notices (SORNs).

c. FY 2009 Accomplishments. During 2009, the Agency continued its focus on achieving a complete and accurate PII holdings inventory. This year also focused on the collection of PII in agency forms, both paper and electronic format. The results of this analysis were published in the NASA FY 2009 Report on Reviewing and Reducing PII and Eliminating the Unnecessary Use of SSNs.

d. FY 2008 Accomplishments. In 2008, the Agency placed its focus on the review of information systems that contain PII and reducing the collection and storage of PII. The results of this analysis were published in the NASA FY 2008 PII Review and Reduction report.

e. FY 2007 Accomplishments. During 2007, the Agency refined and revalidated its PII holdings inventory. The information collected was further analyzed to identify opportunities and plans for reducing PII holdings to include where specific uses and collection of the SSN could be reduced or eliminated.

f. FY 2006 Accomplishments. In 2006, the Privacy Act Officer, coordinating with each of the Center's Privacy Act Managers (CPMs), compiled details of the types of PII used throughout the Agency, the data sources that contain PII, the uses and dissemination of PII, and the methods used to store and safeguard PII. This was used as the initial baseline inventory of NASA systems and applications containing PII.

4.1.2 Plan and Schedule for Annual Review and Reduction of PII

NASA expects to further reduce the Agency's PII holdings annually, both electronic and non-electronic format, and eliminate the unnecessary use of SSNs using the periodic review process as identified in this plan. In FY 2012, NASA will be working to develop enhanced automated processes to support year round continuous inventory, monitoring and tracking as discussed in 4.1.1.a.1 above. This very significant improvement will apply to the tracking of PII collections both electronic and in paper form, through required updates to the Privacy Impact Assessment (PIA) System module and update of the integrated MPII module, a statistical dash-board and FISMA reporting module. The revised system, (which will be known as the Sensitive Unclassified Information Management System (SUIMS), will have a Review and Reduce component in order to better manage review and reduce activities throughout the year and will support each of our annual milestones for FISMA. The pursuit of these initiatives will: support a reduction in the overall effort currently expended at review and assessment time, better support continued efforts and tracking of follow up actions, reduce man hour expenditures on the part of CPMs and System Owners alike and afford the system owners the opportunity to be notified when regular reviews are required or other actions are necessary, in a much more efficient way, electronically and automatically.

This section sets forth NASA's plan for ongoing annual reviews to further validate PII holdings and reductions. The specific procedures and processes are documented in ITS-HBK-1382.03-02. The handbook documents and clarifies the specific steps required for annual reviews, and clearly delineates the data elements to be reported.

a. In the first quarter of each fiscal year the Privacy Program Manager develops guidelines and formulates and drafts the action for the annual Review and Reduce PII and Eliminate Unnecessary Use of SSNs.

b. In the second quarter of each fiscal year, CPMs currently receive an OCIO action to begin coordinating with the owners of systems, applications, or other data holdings which contain PII (including SSNs). They initiate their activities and conduct a review and reduction analysis. Owners of systems, applications, or other data holdings which contain PII will complete the annual PII review and reduction analysis and provide their results to the CPMs as requested.

c. In the third quarter of each fiscal year the CPM aggregates and analyzes the reports from owners of systems, applications and other data holdings which contain PII (including SSNs). During this analysis the CPM discovers redundancies or questionable holdings and identifies methods of reducing those holdings of PII and provides ongoing support throughout the reduction activity. By the end of the third

quarter, CPMs will analyze the responses from the owners of systems, applications, or other data holdings containing PII and consolidate results to the NASA Privacy Program Manager as detailed in the Review and Reduce PII and Eliminating Unnecessary Use of SSN Handbook.

d. In the fourth quarter of each fiscal year, the NASA Privacy Program Manager will review each Center's report, and draft the Agency annual PII review and reduction report that will be included in the annual Federal Information Security Management Act (FISMA) submission to OMB.

4.2 Plan and Schedule for Eliminating Unnecessary Use of SSNs

NASA's objective is to maximize the protection of SSNs when their use is required and eliminate their use when they are not necessary. For this reason NPD 1382.17, the NASA Privacy Policy, specifies that SSNs not be used unless mandated by external requirements. The NPD further requires that system owners whose systems contain SSNs work with the OCIO to develop a plan for switching to other Agency specific identifiers.

4.2.1 Current Accomplishments

The following summarizes the actions to date that NASA has accomplished towards the objectives of eliminating the unnecessary use of SSNs:

a. FY 2011 Accomplishments. During 2011, the Agency refined the process for eliminating unnecessary use of SSNs via an updated handbook, ITS-HBK-1382.03-02. Following the guidelines outlined in the handbook, the CPMs provided the NASA Privacy Program Manager with their report on eliminating the unnecessary use of SSNs via the consolidated center report outlined in ITS-HBK-1382.03-02. The results of this analysis were published in the NASA FY 2011 Report on Reviewing and Reducing PII and Eliminating the Unnecessary Use of SSNs.

a. FY 2010 Accomplishments. During 2010, the CPMs provided the NASA Privacy Program Manager with their report on eliminating the unnecessary use of SSNs. The results of this analysis were published in the NASA FY 2010 Report on Reviewing and Reducing PII and Eliminating the Unnecessary Use of SSNs.

b. FY 2009 Accomplishments. During 2009, the CPMs developed and submitted action plans to the Privacy Program Manager outlining their approach to reviewing forms that collected PII, focusing on those that collect SSNs. The results of this analysis were published in the NASA FY 2009 Report on Reviewing and Reducing PII and Eliminating the Unnecessary Use of SSNs.

c. FY 2008 Accomplishments. During 2008, the Agency refined and revalidated its holdings of SSN inventory. System owners were required to; 1) justify and document their use of SSNs if not able to replace them with a NASA UUPIC, 2) provide a date when the system would be converted to the NASA UUPIC, or 3) provide a date when the system would be decommissioned. The information collected was further analyzed to identify opportunities and plans where specific uses and collection of the SSN could be reduced or eliminated. The results of this analysis were published in the NASA FY 2008 PII Review and Reduction report.

d. FY 2007 Accomplishments. Recognizing a national increase in incidents involving Government held PII, including SSNs, the NASA OCIO initiated an effort in May 2007 to build upon Agency data gathered in response to OMB's December 5, 2006 action to survey Agency processes utilizing SSNs. The May

activity required NASA organizations to review their holdings of SSNs with the objective of eliminating their unnecessary use.

4.2.2 Plan and Schedule for Eliminating the Unnecessary use of SSN

The information provided by the previous year's reviews has enabled NASA to set solid goals for eliminating the unnecessary use and collection of SSNs in information systems, reports, forms, etc. The schedule for eliminating unnecessary Use of SSNs follows the schedule outlined in section 4.1.2. This section sets forth NASA's plan for the elimination of the unnecessary use of SSNs as NASA enhances its privacy program and privacy protections:

- a. Information Systems. Follow-up with Information System Owners to ensure a timeline has been established for; 1) the decommissioning or consolidation of the 9 systems identified for decommissioning or consolidation in FY12 and FY13; and, 2) determining feasibility of consolidation for the systems that were identified as potential candidates for consolidation.
- b. Identify Use of SSNs on Paper Holdings. In conjunction with the action identified in paragraph 4.1.2, additional reviews will be conducted to identify those program offices where paper holdings that display SSNs are used on a regular basis. Those paper holdings displaying full SSNs will be evaluated to determine if there is a confirmed business requirement for creating and/or maintaining these holdings and if possible eliminate the use of SSN or at a minimum reduce the display of SSNs to the greatest extent possible. Where use of the SSN on paper holdings is not justified, a plan will be developed to include milestones and a timeline for the elimination of SSN relevant language and usage for paper holdings.
- c. Securing Use of Necessary SSNs. NASA will continue to implement additional security measures to protect holdings of SSNs where its use cannot be eliminated due to confirmed, justified requirements:

Existing System Review. For those information systems that currently collect, use, maintain and/or disseminate SSN, an Initial Privacy Threshold Analysis (IPTA) will be conducted which identifies the reason the SSN is needed. If an IPTA already exists for the system, then the program will ensure there is an additional explanation regarding the need to continue collecting and maintaining the SSN. The IPTA will be reviewed to ensure that the need to collect, use, maintain, and/or disseminate the SSN is required by statute or regulation and/or is pursuant to a specific confirmed and authorized purpose.

New System Development. Prior to the development of a program that seeks to collect, use, maintain, and/or disseminate SSN, the program will prepare an IPTA which identifies the reason the SSN is needed. The IPTA will be reviewed to ensure that the need to collect, use, maintain, and/or disseminate the SSN is required by statute or regulation and/or determine whether collection is authorized for a specific purpose.

System Controls. Sufficient security controls are required to be implemented in order to mitigate the risk of inappropriate or unauthorized disclosure of data containing SSNs. Any access to SSNs shall continue to be restricted with an appropriate application of security controls. Information System Owners of applications with justification for maintaining SSNs will identify actions they have already taken, or will take, to provide additional protection of data. Such actions will include suppressing visibility of SSNs, masking SSNs where visible, maintaining audit logs tracking the access to SSNs, etc.

d. Verification and Maintenance (annually thereafter). Review of the use of SSNs in electronic and non-electronic form and verification that the continued use is still required will be conducted during the annual Review and Reduction of PII analysis.

e. Training and Awareness. Internal communication to staff within NASA on how to identify and reduce the use of SSNs is developed as appropriate.

Employee Reminders. Notices and other outreach initiatives will be sent to all NASA employees reminding them of their responsibilities regarding the use and protection of SSNs and to eliminate unnecessary use of SSNs in forms.

System Developers. Notices will be sent to system developers and programmers to re-evaluate the use of SSN in existing applications. Guidance will be provided on masking or blocking the display of SSNs on reports and computer screens.

5. Responsibilities

a. The NASA Senior Agency Official for Privacy (SAOP) shall:

- Ensure the development, publication, and updating of the NASA plan and schedule for reviewing and reducing Agency held PII and eliminating unnecessary use of SSNs.
- Make publicly available the annual NASA Reviewing and Reducing PII and Eliminating the Unnecessary Use of SSNs report.

b. The NASA Privacy Programs Manager shall:

- Develop, publish, and update the Review and Reduce PII and Eliminating Unnecessary Use of SSNs Handbook to conduct annual reviews and provide implementation processes and procedures.
- Implement the schedule included in this plan for updating the review and reduction of NASA PII holdings.
- Provide progress updates on the annual PII review and reduction analysis to the NASA SAOP.
- Draft the annual NASA Review and Reduce PII and Eliminating Unnecessary Use of SSNs report during the fourth quarter of the fiscal year to meet OMB requirements.
- Provide follow-up actions to the appropriate CPMs through the Center CIOs to ensure actions are completed for those areas where PII holdings can be reduced as indicated in the previous annual NASA Review and Reduce PII and Eliminating Unnecessary Use of SSNs report.
- Develop employee notices regarding the use of SSNs and eliminating the unnecessary use in electronic and non-electronic form
- Maintain a heightened awareness on the part of System Owners who maintain PII and SSNs through outreach and automatic notifications from the SUIMS system upon completion.

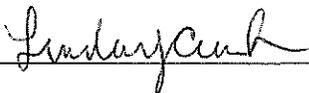
c. Center and Mission Directorate Chief Information Officers (CIOs), through the CPMs, shall implement this plan.

d. The CPMs shall:

- Conduct the annual PII review and reduction analysis at their Centers during the third quarter of each fiscal year in accordance with this plan and the Review and Reduce PII and Eliminating Unnecessary Use of SSN Handbook.
- Provide annual PII review and reduction consolidated results to the NASA Privacy Programs Manager, by the end of the third quarter of the FY.
- Review IPTAs to ensure that the need to collect, use, maintain, and/or disseminate the SSN is required by statute or regulation and/or is pursuant to a specific authorized purpose.
- In coordination with Center program offices, identify those areas where data holdings that contain PII are used on a regular basis and evaluate the business requirement for creating and maintaining these holdings. Prepare a plan to eliminate the use of those holdings where justification for continued use cannot be provided.

e. Owners of systems, applications, or other data holdings containing PII shall conduct, at the direction of the CPM, the PII review and reduction analysis in accordance with this plan and the Review and Reduce PII and Eliminate the Unnecessary Use of SSNs Handbook.

6. Approval



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



Date