



# Privacy Impact Assessment (PIA)

**Full Entry Name:** COVID-19 Contact Tracing Application

**Branch:** Enterprise Applications Management Office

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## System Overview:

The National Aeronautics and Space Administrations (NASA) medical teams are currently tracking NASA’s COVID-19 cases manually and lack a unified and modern solution. Modern solutions do exist. NASA will use a commercial-off-the-shelf product, Accenture pre-packaged accelerator to develop and deliver the Tracking and Tracing application on NASA’s enterprise solution of Salesforce. The Tracking and Tracing application will be critical in managing the return of NASA’s 60,000 employees to all 10 centers. This published Privacy Impact Assessment (PIA) is a living document and will be updated as requirements are introduced and/or modified relative to privacy. This initial PIA is for the release of the minimal viable product of this COVID-19 Contact Tracing Application.

Due to the time critical nature of enabling NASA’s employees to return to the centers as quickly as possible, the Accenture product will not follow a standard project life-cycle process which introduces some risk.

Privacy	
Collection contains the following:	Name Work phone number Work cell phone number Personal cell phone number Work e-mail address Personal e-mail address Home mailing address Work Mailing Address Home Phone Number

The application/website/information system stores, collects, or maintains Information in Identifiable Form (IIF).	Yes
Information is collected on the following:	NASA Contractors Government Employees Members of the public (excluding contractors and partners) Business Partners/Contracts, Grantees (including, but not limited to federal, state, local agencies) Contractors/Vendors/Suppliers
The collection of PII is justified.	Yes
Law, Regulation, or Government-wide policy justifies the collection of the information.	The Space Act Authority of 1958; (OMB) M 20-23, Aligning Federal Agency Operation with the National Guidelines for Opening Up America Again; 5 USC 500-504 (Administrative Procedure Act); 5 USC Sec. 552 (Freedom of Information Act); 5 USC 552a (Privacy Act); 5 USC Part III (Employees)
NASA will use the information in the following ways:	NASA will use the information to determine if an individual has had possible contact with an individual who has either tested positive for COVID-19 or been in the vicinity of a positive contact
The collection is the minimum necessary to accomplish the purpose of the collection.	Yes

<b>Consent</b>	
The IIF is collected	Voluntary
<b>There is a process in place for the following:</b>	
Ensuring consent is obtained from the individuals whose IIF is stored, collected, or maintained.	Yes
Allowing the individual whose IIF is stored, collected, or maintained to choose how their IIF is used.	Not Applicable

<b>Security Controls</b>	
Monitor and Response to privacy and/or security incidents policies.	Yes
Access controls.	Yes
Technical controls (safeguards) are in place to minimize the possibility of unauthorized access, use, or dissemination of the IIF in the application/ website/ information system/ cloud system.	Yes

<b>Information Sharing Practices</b>
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The application/ website/ information system/ cloud systems collects IIF from other resources (e.g., databases, websites).	No
The application/ website/ information system/ cloud system populates data for other resources (e.g., databases, websites, or external agencies, people, or organizations).	No

<b>Accessibility, Redress, Complaints</b>	
There is a process in place for periodic reviews of IIF in the system to ensure data integrity, availability, accuracy, and relevance.	Not Applicable

<b>Privacy Act of 1974</b>	
Records on individuals are or will be routinely retrieved from the system by using individual's name or other unique identifier (e.g., personal account number, UUPIC, SSN, etc. is used to locate information about an individual in the application/website/information system/paper record).	No
The records in the system are covered by an existing published System of Records Notice (SORN).	Existing SORN applicable
The SORN Name and Number.	<a href="#">NASA SORN 10HIMS, Health Information Management System</a>

<b>Paperwork Reduction Act</b>	
The record/application/website/information system collects information in a standard way (via forms, surveys, questionnaires, etc.) from 10 or more persons (e.g., members of the public and NASA contractors, and grantees).	Yes
There is an OMB Control Number.	Yes
The OMB Control Number.	OMB Control # 2700-0178

<b>Web Measurement and Customizing Technology</b>	
The Application/Website/Information System Utilizes Web Measurement and Customization Technology (Cookies/Persistent Tracking).	No

Concur:

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STURKEN, IAN

Information System Owner (ISO)

Date: 07/10/2020

Concur:

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HARRIS HOULT, STAYCE D

Center Privacy Manager (CPM)

Date: 07/10/2020

Concur:

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Center Chief Information Officer (CIO)

Date: 07/10/2020

Concur:

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Diederich, Bryan R

FEINBERG, SHARI R

NASA Office of General Counsel (OGC)

Date: 07/14/2020

Concur:

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HARRIS HOULT, STAYCE D  
NASA Privacy Program Manager (PPM)  
Date: 07/14/2020

Concur:

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Franklin, Cadwallader  
JACKSON, JUSTIN W  
Witt, Michael  
NASA Senior Agency Information Security Officer (SAISO)  
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Concur:

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SEATON, JEFFREY M  
NASA Senior Agency Official for Privacy (SAOP)  
Date: 07/21/2020