



NATIONAL
ENDOWMENT
FOR THE
HUMANITIES

OFFICE OF THE CHIEF
INFORMATION OFFICER

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January 1, 2009

FROM: Brett Bobley, Chief Information Officer
TO: OIRM Staff
SUBJECT: Policy for Conducting Privacy Impact Assessments (PIAs)

As per the E-Government Act of 2002, it is important that OIRM conduct Privacy Impact Assessments (PIAs) for our major IT systems. These PIAs shall be created and updated as per the guidance provided by OMB in OMB M03-22, available at:
<http://www.whitehouse.gov/omb/memoranda/m03-22.html>.



PRIVACY IMPACT ASSESSMENT

Instructions: As per the E-Government Act of 2002, the agency must perform a Privacy Impact Assessment (PIA) before: (a) developing or procuring IT systems or projects that collect, maintain or disseminate information in identifiable form from or about members of the public, or (b) initiating, consistent with the Paperwork Reduction Act, a new electronic collection of information in identifiable form for 10 or more persons (excluding agencies, instrumentalities or employees of the federal government). As per OMB M03-22, this PIA should be updated when major changes are made to an existing system.

The key to a successful PIA is to ensure that the public is informed of exactly what we will be doing with their private information. The agency Chief Privacy Officer must approve the PIA before the system can be put into use. (Note that the NEH Chief Information Officer serves in the role of Chief Privacy Officer.)

Name of System:	General Support System (GSS)
Date of this PIA:	November 18, 2013
Notes:	As per the NEH PIA policy, PIAs must be updated when a major system update occurs. The e-mail system that is part of the GSS recently underwent a change, moving from a locally-hosted Exchange server to one hosted by Microsoft in the cloud ("Office 365"). Hence, we are updating the PIA for this system.
Name and Office of Person(s) Interviewed for PIA	1) Charles Hester (System Owner) was interviewed by Brett Bobley, Chief Information Officer, on 11/18/2013. 2) Lisette Voyatris, General Counsel's Office, was interviewed by Brett Bobley on 11/18/2013.
Brief Description:	This system includes the typical desktop applications like Word, Excel, Outlook, as well as the network/server/printer infrastructure.
Who is the Audience (e.g. what kinds of individuals will be providing us with information about themselves?)	It should be noted that the GSS isn't intended to collect information from any particular audience. However, as a general collection of information in many forms (e-mails, memos, etc), there is information about the daily business of the NEH. This would include our interaction with grantees, applicants, panelists, agency employees, and other government agencies and private companies with whom we do business.
What information is to be collected (e.g., names, addresses, phone numbers)?	As a general system, the GSS wasn't designed to collect information per se. That said, dispersed among the documents on this system would certainly be some names, address, phone numbers, SSNs, and other pieces of PII data.
Why is the information being collected?	The information is collected to facilitate the day-to-day operations of the agency.
What is the intended use of the information?	The information is used in the daily business of processing grants, communicating with other agencies and the private sector.
With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office?)	The e-mail portion of the GSS is "cloud-based" and is stored on a server maintained by the Microsoft Corporation. The remaining data is stored on systems owned by the NEH. However, none of the information in GSS is systematically shared. That said, information generated by staff is certainly shared on an ad-hoc basis (e.g. a press release might be written in the GSS and then posted on the agency website, e-mails are sent to grantees and others, etc).

Does the system describe to the audience exactly what we will do with the information we collect from them?	n/a – GSS is not a public-facing system.
Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	n/a – not a public-facing system.
What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	n/a – not a public-facing system.
How will the information be secured (e.g., administrative and technological controls)?	The GSS system is secured according to NIST guidelines and is subject to yearly FISMA review. In regard to privacy, the NEH has a privacy policy (M-111, “Safeguarding Personally Identifiable Information”) that governs how users should treat PII. This policy is cited in yearly security training. One important policy change to the GSS that occurred with the change to Office365 relates to two-factor authentication. Under new policy, users in Accounting, OIRM, HR, and ASO are required to use two-factor authentication. This is because those users are more likely to deal with PII. Other NEH users are allowed to use the Outlook Web Access system that doesn’t require two-factors. However, before using OWA, users must undergo PII training and sign a release form.
Is a system of records being created under the Privacy Act, 5 U.S.C. 552a.?	According to GC, this system may require a System of Record Notification (SORN). As of 11/18/2013 they are investigating this.
If not, how will you store federal records created by this new system?	Records are being stored according to the agency’s long-stand approved records schedule. This schedule hasn’t changed since the previous PIA was conducted.
Comments. Please use this space to provide any additional comments or analysis about this system.	The Chief Information Officer, in consultation with the GC and other NEH officials, is embarking on a major, multi-year plan to update our records management systems beginning in 2014. This will include updates that will affect this PIA which should be re-evaluated as records practices are changed.
Signature and date of NEH Staff Member who Performed this PIA.	Brett Bobley, Chief Information Officer, Office of the Chairman, 11/18/2013 
	This system is (circle one): approved not approved



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Name of System:	Oracle Accounting System
Date PIA Conducted:	July 27, 2006
Name and Office of Person(s) Interviewed for PIA	1) John Gleason, Director of Accounting was interviewed by Brett Bobley, Chief Privacy Officer, July 27, 2006. 2) Heather Gottry, General Counsel, was interviewed by Brett Bobley on August 1, 2006. 3) Barry Maynes, Agency Records Officer, had telephone and in-person conversations with Brett Bobley on 7/31/06 and 8/2/06.
Brief Description:	Oracle Accounting System used for all internal financial accounting. The system is hosted by Oracle Corporation. The NEH accesses it remotely over a secure VPN connection.
Who is the Audience (e.g. what kinds of individuals will be providing us with information about themselves?)	Individual grant awardees; panelists who are paid for service; agency employees. There is also data about vendors who are paid for products and services purchased by the agency.
What information is to be collected (e.g., names, addresses, phone numbers)?	Typically names, addresses, phone numbers, and SSNs for individuals.
Why is the information being collected?	It is collected so that the individuals can be paid and a proper accounting of the payment can be made.
What is the intended use of the information?	It is used to make payments and keep accounting records.
With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office?)	When payments are ready to be made, data is exported to the Department of Treasury's Secure Payment System. It is that system which actually deposits money into the recipient's bank.
Does the system describe to the audience exactly what we will do with the information we collect from them?	Yes, all individuals who are paid via the system must fill out an SF-3881 form. This form includes a Privacy Act statement approved by OMB.
Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	The Privacy Act statement doesn't cover this – it only mentions what the information will be used for (not what it won't be used for).
What opportunities do individuals	None.

have to decline to provide information or to consent to particular uses of the information?	
How will the information be secured (e.g., administrative and technological controls)?	Oracle provides the agency with a detailed SAS-70 that describes the security controls they have in place. The agency also has developed a local role-based security policy for the system.
Is a system of records being created under the Privacy Act, 5 U.S.C. 552a.?	After discussions with the agency General Counsel, it was determined that the agency's list of official systems of records needs to be updated. At the time of the last update, the agency listed our previous Wang-based accounting system. This needs to be updated to reflect the new Oracle system. The General Counsel's office is taking up this project and intends to update the systems of record within the next few months.
If not, how will you store federal records created by this new system?	Even though Oracle is not listed as a system of record, the records it produces are consistent with the ones produced by the previous system. As per the agency records officer, the records are stored and disposed of using the agency's existing records schedule, as per NARA guidelines.
Comments. Please use this space to provide any additional comments or analysis about this system.	
Signature and date of NEH Staff Member who Performed this PIA.	 8/2/06
Signature of NEH Chief Privacy Officer	This system is (circle one): <u>approved</u> not approved

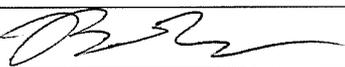


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Name of System:	Grants Management System
Name and Office of Person(s) Interviewed for PIA	1) Rich Murphy (System Owner) was interviewed by Brett Bobley, Chief Privacy Officer, on July 26. 2) Heather Gottry, General Counsel, was interviewed by Brett Bobley on August 1, 2006. 3) Barry Maynes, Agency Records Officer, had telephone and in-person conversations with Brett Bobley on 7/31/06 and 8/2/06.
Brief Description:	Back-end grants processing system.
Who is the Audience (e.g. what kinds of individuals will be providing us with information about themselves?)	The audience is comprised of non-profit institutions (schools, libraries, museums) that are applying for grants. Also, individual scholars who are applying for grants.
What information is to be collected (e.g., names, addresses, phone numbers)?	Names, addresses, phone numbers, SSNs, e-mail, fax for project directors, grant administrators, and panelists. In addition, we are collecting the grant application data itself (e.g. narrative, amount of money requested, resumes, etc).
Why is the information being collected?	The information is collected so that the applications can be evaluated and grants made.
What is the intended use of the information?	The information is used by peer review panels and by NEH staff to determine which grants are made. Once a grant is made, the information is used to process and pay the grantee.
With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office?)	Information about grantees is shared with the NEH's Office of Accounting. The information is exported from GMS and imported into the Oracle accounting system and, later, Treasury's Secure Payment System.
Does the system describe to the audience exactly what we will do with the information we collect from them?	Yes, our agency privacy policy does address what is done with the information.
Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	Yes, that is in the privacy policy.
What opportunities do individuals have to decline to provide	When applicants apply via grants.gov, they can decline to provide an SSN. However, individual applicants who are awarded a grant (or panelists who are

information or to consent to particular uses of the information?	paid a fee) must provide an SSN for IRS reporting purposes.
How will the information be secured (e.g., administrative and technological controls)?	The GMS server is secured as per NIST guidelines. The GMS application uses role-based security to control access.
Is a system of records being created under the Privacy Act, 5 U.S.C. 552a.?	After discussions with the agency General Counsel, it was determined that the agency's list of official systems of records needs to be updated. At the time of the last update, the agency listed Augustus and PRISM (our previous grants processing system). This needs to be updated to reflect the new GMS system. The General Counsel's office is taking up this project and intends to update the systems of record within the next few months.
If not, how will you store federal records created by this new system?	Even though GMS is not listed as a system of record, the records it produces are consistent with the ones produced by the previous system. As per the agency records officer, the records are stored and disposed of using the agency's existing records schedule, as per NARA guidelines.
Comments. Please use this space to provide any additional comments or analysis about this system.	
Signature and date of NEH Staff Member who Performed this PIA.	 8/2/06
Signature of NEH Chief Privacy Officer	This system is (circle one): approved not approved