

## **EZ PIA**

*This form should only be used for systems that do not qualify as a major information system. It is designed for small projects, databases, Web 2.0 applications, etc. For questions about the form you should contact NGC*

### **I. System identification**

- a. System name:** IdeaScale
- b. System owner:** Pamela Wright
- c. Office system is located in:** NPOL
- d. PIA author name:** Hannah Bergman, Pamela Wright. **Phone:** 301-837-0344
- e. Date of PIA:** September 20, 2010
- f. One paragraph description of the system:**

NARA uses the IdeaScale platform both externally and internally to gather input, ideas, and opinions on various projects. The platform is a key part of implementing NARA's Open Government goals. It is hosted externally.

### **II. Privacy Assessment**

- a. What information is being (or will be collected)? For databases, list fields**  
NARA does not collect, maintain or disseminate PII from individuals who interact with NARA through our IdeaScale. IdeaScale collects any information necessary to create accounts. Participants can voluntarily provide e-mail address, first and last name, and zip code. Email addresses are verified for complete format only. Before access is permitted a return email will be sent to verify that the email address is a functioning email address.

- b. Why is the information being collected?**

Any PII that is collected is done so through the management of federal records. NARA does not collect PII beyond that identifying information which is shared by a user in the IdeaScale.

- c. How do you intend to use this information?** Information gathered through the management of federal records is used to document the development of federal policies and managed with a federal records schedule.

The information will not be used by the Agency. The service provider's tool uses email addresses only as a means of identifying a user of the dialog. Zip codes may be used to aggregate responses for purposes of metrics (such as number of responses from various regions of the country).

d. **With whom will the information be shared?**

The system administrators, moderators and participants will have access to Ideas and comments submitted, as well as the limited profile information voluntarily submitted by each participant, as this is a public dialogue intended for transparent uses. Moderators can delete inappropriate comments from the dialogue and/or promote off topic comments to another site. Only System Administrators have access to the file of email addresses, first and last name, and zip code. Information on emails and names are not to be exported or downloaded for any purpose, but zip codes, as available, may be analyzed to determine from which areas of the United States ideas and comments are being submitted. None will be tied in any way to individual names.

e. **How is the information stored?** Electronically and in paper form

i. **What records schedule applies?** The records are unscheduled.

ii. **For how long will the information be kept?** Unscheduled records are retained as permanent until they are scheduled.

f. **What notice or opportunities for consent is provided to individuals when their information is collected?** All information collected through the capture of NARA's IdeaScale pages is information voluntarily shared by individuals with NARA.

A disclaimer in the Privacy Policy will ensure that participants are notified that e-mail addresses and other account information resides on IdeaScale's servers rather than NARA's.

IdeaScale uses two optional persistent cookies to recognize returning participants so they do not have to log in each time they visit the site.

- IdeaScale uses persistent cookies to save user login information (the user's login ID) between sessions. The user is given a choice (an "opt in" approach) to check a box to stay signed in. This is an optional convenience so the user does not have to remember the login information each time they visit the site.

- IdeaScale also uses a persistent cookie to support the use of external login ID's (e.g., Google, AOL, Yahoo, and Wordpress). This allows the user to interact with IdeaScale without having to create a new login ID for use with the site if they already have one with these other partners. NARA has turned off this functionality to enhance users' privacy.

i. **If there is a privacy policy in place, please provide the text of it and describe how it is made available to users.**

All of NARA's external uses of the IdeaScale include a link to our comment and posting policy at <http://www.archives.gov/social-media/idea-forum-comment-policy.html> and information about the privacy policies.

The privacy notice says:  
PRIVACY NOTICE

This site is not hosted by the National Archives and Record Administration and thus the privacy policies of NARA do NOT apply. The privacy policy for this web site may be found at <http://support.ideascale.com/faqs/ideascale-setup/privacy-policy>. NARA retains records of the content on the NARA portion of this site, as is provided for in our records retention schedules and mandated by the Federal Records Act. These records include user comments and any personally identifiable information a commenter shares with NARA. Because these records are collected from a public web site, they may be disclosed to others and used by NARA in the conduct of agency business. Please do not share information such as social security numbers, birth dates, or other private information that you do not want to make available to others. NARA disclaims any liability for any loss or damage resulting from any comments posted on this page. This forum may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy.

Information about NARA activities and other methods to communicate with NARA are also available on NARA's official web page at [www.archives.gov](http://www.archives.gov) along with archival photos, videos, and other documents. The privacy policy for [www.archives.gov/](http://www.archives.gov/) may be found there.

**11. Is this system a Privacy Act system of records? No**

**If yes, then what SORN is the system covered by?**

N A.

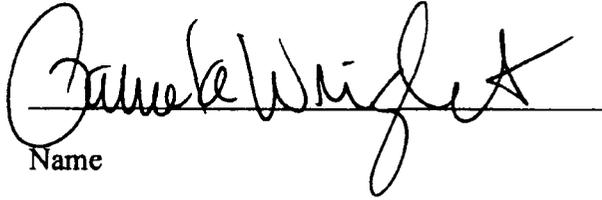
**g. How is the information secured?**

All PII is secured in accordance with NARA's internal directive on PII. In particular, sensitive PII removed from a wiki page in accordance with the comment and posting

policy is stored electronically in a password protected file. This information is not kept by the office which manages the wiki.

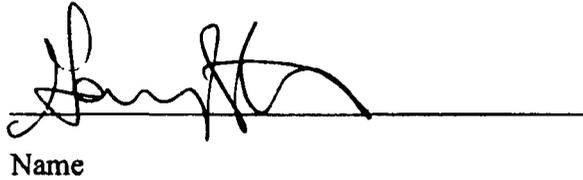
**III. Approval of PIA**

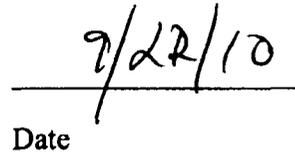
**a. System owner**

  
Name

  
Date

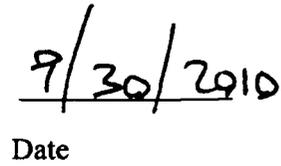
**b. Senior agency Official for Privacy**

  
Name

  
Date

**c. Chief Information Officer**

  
Name

  
Date