

NARA
Privacy Impact Assessment
 for the

Points of Contact and Signatures

<p>ISSO/IT Security POC</p> <p>Name: Office: Phone: Bldg./Room Number: Email:</p>	<p>PIA Author (if different from POC)</p> <p>Name: Office: Phone: Bldg./Room Number: Email:</p>
<p>Chief Information Officer</p> <p>Name: Office: Phone: Bldg./Room Number: Email:</p> <p>Signature and date signed: _____</p>	<p>System Owner</p> <p>Name: Office: Phone: Bldg./Room Number: Email:</p> <p>Signature and date signed: _____</p>

<p>Senior Agency Official for Privacy</p> <p>General Counsel</p> <p>Signature and date signed: _____</p>

[This PIA should be completed in accordance with the NARA 1609. The following questions are intended to define the scope of the information in the information technology, specifically the nature of the information and the sources from which it is obtained. The responses should be written in plain language and should be as comprehensive as necessary to describe the information technology.]

Section 1: Executive Summary

Provide a high-level overview of the information technology (e.g., application, tool, automated process) in non-technical terms that describes the information technology, its purpose, how the information technology operates to achieve that purpose, the general types of information involved, how information may be used and shared, and why a Privacy Impact Assessment was conducted. (Note: This section is an overview; the questions below elicit more detail.)

Section 2: Purpose and Use of the Information Technology

2.1 *Explain in more detail than above the purpose of the information technology, why the information is being collected, maintained, or disseminated, and how the information will help achieve the Component's purpose, for example, for criminal or civil law enforcement purposes, intelligence activities, and administrative matters, to conduct analyses to identify previously unknown areas of concern or patterns.*

2.2 *Indicate the legal authorities, policies, or agreements that authorize collection of the information. (Check all that apply and include citations/references.)*

Authority		Citation/Reference
<input type="checkbox"/>	Statute	
<input type="checkbox"/>	Executive Order	
<input type="checkbox"/>	Federal Regulation	
<input type="checkbox"/>	Agreement, memorandum of understanding, or other documented arrangement	
<input type="checkbox"/>	Other (summarize and provide copy of relevant portion)	

Section 3: Information in the Information Technology

3.1 *Indicate below what types of information that may be personally identifiable in Column (1) will foreseeably be collected, handled, disseminated, stored and/or accessed by this information technology, regardless of the source of the information, whether the types of information are specifically requested to be collected, and whether particular fields are provided to organize or facilitate the information collection. Please check all that apply in Column (2), and indicate to whom the information relates in Column (3). Note: This list is provided for convenience; it is not exhaustive. Please add to "Other" any other types of information.*

(1) General Categories of Information that May Be Personally Identifiable	(2) Information is collected, processed, disseminated, stored and/or accessed by this information technology (please check each applicable row)	(3) The information relates to: A. NARA Employees, Contractors, and Detailees; B. External users or Individuals Outside of NARA (such as other Federal agencies); C. Members of the public	(4) Comments
<i>Example: Personal email address</i>	✓	<i>B and C</i>	<i>Website will collect email addresses of individuals outside NARA</i>
Name			
Date of birth or age			
Place of birth			
Gender			
Race, ethnicity or citizenship			
Religion			
Social Security Number (full, last 4 digits or otherwise truncated)			
Tax Identification Number (TIN)			
Driver's license			
Alien registration number			
Passport number			

(1) General Categories of Information that May Be Personally Identifiable	(2) Information is collected, processed, disseminated, stored and/or accessed by this information technology (please check each applicable row)	(3) The information relates to: A. NARA Employees, Contractors, and Detailees; B. External users or Individuals Outside of NARA (such as other Federal agencies); C. Members of the public	(4) Comments
Mother's maiden name			
Vehicle identifiers			
Personal mailing address			
Personal email address			
Personal phone number			
Medical records number			
Medical notes or other medical or health information			
Financial account information			
Applicant information			
Education records			
Military status or other information			
Employment status, history, or similar information			
Employment performance ratings or other performance information, e.g., performance improvement plan			
Certificates			
Legal documents			
Device identifiers, e.g., mobile devices			

(1) General Categories of Information that May Be Personally Identifiable	(2) Information is collected, processed, disseminated, stored and/or accessed by this information technology (please check each applicable row)	(3) The information relates to: A. NARA Employees, Contractors, and Detailees; B. External users or Individuals Outside of NARA (such as other Federal agencies); C. Members of the public	(4) Comments
Web uniform resource locator(s)			
Foreign activities			
Criminal records information, e.g., criminal history, arrests, criminal charges			
Juvenile criminal records information			
Whistleblower, e.g., tip, complaint or referral			
Procurement/contracting records			
Proprietary or business information			
Location information, including continuous or intermittent location tracking capabilities			
<i>Biometric data:</i>			
- Photographs or photographic identifiers			
- Video containing biometric data			
- Fingerprints			
- Palm prints			
- Iris image			
- Dental profile			
- Voice recording/signatures			

(1) General Categories of Information that May Be Personally Identifiable	(2) Information is collected, processed, disseminated, stored and/or accessed by this information technology (please check each applicable row)	(3) The information relates to: A. NARA Employees, Contractors, and Detailees; B. External users or Individuals Outside of NARA (such as other Federal agencies); C. Members of the public	(4) Comments
- Scars, marks, tattoos			
- Vascular scan, e.g., palm or finger vein biometric data			
- DNA profiles			
- Other (specify)			
<i>System admin/audit data:</i>			
- User ID			
- User passwords/codes			
- IP address			
- Date/time of access			
- Queries run			
- Content of files accessed/reviewed			
- Contents of files			
Other (please list the type of info and describe as completely as possible):			

3.2 Indicate below the source(s) of the information. (Check all that apply.)

Directly from the individual to whom the information pertains:				
In person		Hard copy: mail/fax		Online
Phone		Email		
Other (specify):				

Other NARA records/sources (list systems):

Other government sources of information (list agency and source):

Non-government sources, check any that apply:				
Members of the public		Public media, Internet		Private sector
Commercial data brokers				
Other (specify):				

Section 4: Information Sharing

4.1 *Indicate with whom the information will be shared and how that will occur, such as on a case-by-case basis by manual secure electronic transmission, external user authorized accounts (i.e., direct log-in access), interconnected systems, or electronic bulk transfer. (Check all that apply).*

Recipient	How information will be shared			
	Individual users	Whole office/agency	Direct log-in access	Explain specifics of the sharing, as well as how these disclosures will support and are compatible with the purposes of the collection.
Within the office that collected the information				
With other offices within NARA				
With other agencies (list agencies):				
Public				
Other (specify):				

4.2 *For non-archival information, if the information will be released to the public explain how the information will be de-identified, aggregated, or otherwise privacy protected. This question does not apply to archival information stored in a system that will undergo standard archival screening and processing in accordance with NARA 1601.*

Section 5: Notice, Consent, Access, and Amendment

- 5.1** *What, if any, kind of notice will be provided to individuals informing them about the collection, use, sharing or other processing of their PII, e.g., a Federal Register System of Records Notice (SORN), providing generalized notice to the public, a Privacy Act § 552a(e)(3) notice for individuals, or both? Will any other notices be provided? If no notice is provided, please explain why.*
- 5.2** *What, if any, opportunities will there be for individuals to voluntarily participate in the collection, use or dissemination of information in the system, for example, to consent to collection or specific uses of their information? If no opportunities, please explain why.*
- 5.3** *What, if any, procedures exist to allow individuals to gain access to information in the system pertaining to them, request amendment or correction of said information, and receive notification of these procedures (e.g., Freedom of Information Act or Privacy Act procedures)? If no procedures exist, please explain why.*

Section 6: Maintenance of Privacy and Security Controls

6.1 NARA uses administrative, technical, and physical controls to protect information. Indicate the controls below. (Check all that apply).

	<p>The information is secured in accordance with Federal Information Security Modernization Act (FISMA) requirements, including development of written security and privacy risk assessments pursuant to National Institute of Standards and Technology (NIST) guidelines, the development and implementation of privacy controls and an assessment of the efficacy of applicable privacy controls. Provide date of most recent Authority to Operate (ATO):</p> <p>If an ATO has not been completed, but is underway, provide status or expected completion date:</p> <p>Unless such information is sensitive and release of the information could pose risks to the component, summarize any outstanding Plan Of Action And Milestones (POA&M) for any privacy controls resulting from the ATO process or risk assessment and provide a link to the applicable POA&M documentation:</p>
	<p>This system is not subject to the ATO processes and/or it is unclear whether NIST privacy controls have been implemented and assessed. Please explain:</p>
	<p>Monitoring, testing, or evaluation has been undertaken to safeguard the information and prevent its misuse. Specify:</p>
	<p>Auditing procedures are in place to ensure compliance with security and privacy standards. Explain how often system logs are reviewed or auditing procedures conducted:</p>
	<p>Contractors that have access to the system are subject to information security, privacy and other provisions in their contract binding them under the Privacy Act, other applicable laws, and as required by NARA policy.</p>
	<p>Indicate whether there is additional training specific to this system, and if so, please describe:</p>

6.2 *Explain key privacy and security administrative, technical, or physical controls that are designed to minimize privacy risks. For example, how are access controls being utilized to reduce the risk of unauthorized access and disclosure, what types of controls will protect PII in transmission, and how will regular auditing of role-based access be used to detect possible unauthorized access?*

6.3 *Indicate how long the information will be retained to accomplish the intended purpose, and how it will be disposed of at the end of the retention period. (Reference the applicable retention schedule approved by NARA.)*

Section 7: Privacy Act

7.1 *Indicate whether information related to U.S. citizens or aliens lawfully admitted for permanent residence will be retrieved by a personal identifier (i.e., indicate whether information maintained by this information technology will qualify as “Records” maintained in a “System Of Records,” as defined in the Privacy Act of 1974, as amended).*

_____ No. _____ Yes.

7.2 *Please cite and provide a link (if possible) to existing SORN(s) that cover the records, and/or explain if a new SORN is being published:*

Section 8: Privacy Risks and Mitigation

When considering the proposed use of the information, its purpose, and the benefit to NARA of the collection and use of this information, what privacy risks are associated with the collection, use, access, dissemination, and maintenance of the information and how are those risks being mitigated?

Note: When answering this question, please specifically address privacy risks and mitigation measures in light of, among other things, the following:

- *Specific information being collected and data minimization strategies, including decisions made to collect fewer data types and/or minimizing the length of time the information will be retained (in accordance with applicable record retention schedules),*
- *Sources of the information,*
- *Specific uses or sharing,*
- *Privacy notices to individuals, and*
- *Decisions concerning security and privacy administrative, technical and physical controls over the information.*

Use this page for additional comments; specify which Section or page for which this is a continuation

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