# REVIEW REPORT

# REVIEW OF THE COLLECTION OF PERSONALLY IDENTIFIABLE INFORMATION ON NASA'S WEB SITES

**February 16, 2001** 



OFFICE OF INSPECTOR GENERAL

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#### Acronyms

IP Internet Protocol

OMB Office of Management and Budget

PCIE President's Council on Integrity and Efficiency

W

TO: AO/Chief Information Officer

FROM: W/Assistant Inspector General for Auditing

SUBJECT: Final Report on the Review of Collection of Personally Identifiable

Information on NASA's Web Sites Assignment Number A0101400 Report Number IG-01-008

The subject final report is provided for your use and comment. Please refer to the Results in Brief section for the overall review results. Our evaluation of your responses has been incorporated into the body of the report. Because management did not agree that certain corrective actions were needed and did not provide sufficient information to support its position on other recommendations, we request additional information as described in the report by March 16, 2001.

If you have questions concerning the report, please contact Mr. Gregory B. Melson, Director, Information Assurance Audits, at (202) 358-2588, or Mr. Ernest L. Willard, Program Manager, at (650) 604-2676. We appreciate the courtesies extended to the audit staff. The final report distribution is in Appendix C.

### [original signed by]

Russell A. Rau

#### Enclosure

cc:

B/Acting Chief Financial Officer
B/Comptroller
BF/Director, Financial Management Division
G/General Counsel
JM/Director, Management Assessment Division

bcc:

AIGA Chron

W/B. Melson

E. Willard

N. Cipolla

### **NASA Office of Inspector General**

IG-01-008 A0101400 February 16, 2001

# Review of Collection of Personally Identifiable Information on NASA's Web Sites

#### Introduction

Online privacy has emerged as one of the key and most contentious issues surrounding the continued evolution of the Internet. The World Wide Web requires the collection of certain data from individuals who visit Web sites in order for the site to operate properly. However, collection of even the most basic data can be controversial because of the public's apprehension about the type of information collected and how it could be used.

Federal agency Web sites are governed by specific laws designed to protect an individual's privacy when agencies collect personal information. The laws require that agencies (1) do not disclose personal information obtained without the individual's consent, (2) grant access to the individual of his/her own records under certain circumstances, and (3) provide protection against disclosure and loss of personal information.

Public Law 106-554 enacted December 16, 2000, requires the NASA Office of Inspector General to report any activity related to the collection of personal information on NASA's publicly accessible Internet Web sites. Specifically, the law requires the Inspector General to report to the Congress any NASA activity relating to:

- (1) the collection or review of singular data, or the creation of aggregate lists that include personally identifiable information, about individuals who access any Internet site of the department or agency; and
- (2) entering into agreements with third parties, including other government agencies, to collect, review, or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits for governmental and nongovernmental Internet sites.

The report is due to the Congress by February 16, 2001.

number, symbol, or other identifying particular assigned to the individual.

<sup>&</sup>lt;sup>1</sup> We interpreted personal information as information that could be tracked to the individual Web site visitor such as name, street address, e-mail address. Our interpretation was based, in part, on information from the Office of Management and Budget, the General Accounting Office and congressional staff.
<sup>2</sup> In this case an individual's own records are those with personal information under the control of any Federal agency from which information is retrieved by the name of the individual or by some identifying

The Office of Management and Budget (OMB) has issued additional guidance on Internet privacy issues directing agencies to post on Federal sites the privacy policies and guidelines for the collection of personal information.

The objective of our review was to address the Public Law 106-554 reporting requirement. For our limited review, we tested a sample of 49 publicly accessible NASA Web sites and reviewed about 600 Web pages<sup>3</sup> within those sites. We also obtained written representation from NASA management regarding third-party agreements to collect, review, or obtain personal information relating to Web site visitors' access or viewing habits. Our scope did not include coverage of contractors' commercial Web sites that may provide information on NASA programs supported by those contractors. See Appendix A for details on our objective, scope, and methodology.

#### **Results in Brief**

For the 49 publicly accessible Web sites we visited, we found that none collected without the user's permission, <sup>4</sup> personally identifiable information from individuals visiting the Agency's Web sites. Some of the sites we visited gather Internet Protocol (IP) addresses of visitors for security purposes. IP addresses could aid in identifying a Web site user, but are not considered personal information. NASA has not entered into third-party agreements to collect, review, or obtain personally identifiable information relating to an individual's access or viewing habits for Internet sites. However, we found three persistent cookies <sup>6</sup> in use at the sites we visited. While these cookies do not collect or store personal information, NASA's use of the cookies and its Privacy Statement <sup>7</sup> are not in full compliance with Federal policies. Additionally, the management of publicly accessible Web sites needs improvement. Without improvements in its privacy policies and practices, NASA cannot ensure adequate protection of the privacy rights of its Web site visitors.

### Background

NASA uses Web-based technology to provide interfaces to a wide variety of resources and information. NASA employees, NASA contractors, researchers, and the general public use these resources and information. To service the public, NASA maintains

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<sup>&</sup>lt;sup>3</sup> A Web page is a file on the World Wide Web.

<sup>&</sup>lt;sup>4</sup> Some NASA sites may ask visitors to voluntarily provide personal information, for example, to respond to the visitor's questions or to register for opportunities available at a site.

<sup>&</sup>lt;sup>5</sup>An IP address is an identifier for a computer or device on an Internet protocol network.

<sup>&</sup>lt;sup>6</sup> Cookies are text files saved in the browser's directory or folder. There are two types of cookies -- session and persistent. A session cookie is automatically deleted when the user's browser is closed. A persistent cookie is a small text file placed on a consumer's computer hard drive by a Web server. The cookie transmits information back to the server that placed it and, in general, can be read only by that server.

<sup>&</sup>lt;sup>7</sup> A Privacy Statement contains an agency's privacy policy. The policy must clearly and concisely inform visitors to the site what information the agency collects about individuals, why the agency collects it, and how the agency will use it. Privacy policies must be clearly labeled and easily accessed when someone visits a Web site.

about 2 million Web pages. The Agency Web sites are among the most visited of all Government sites. For example, the main Agency site alone received a total of 64.1 million visits during the year 2000. As a result NASA is considered a high-impact<sup>8</sup> agency.

#### **NASA Privacy Policies**

**Finding.** Our limited review showed that none of the NASA publicly accessible Web sites tested were collecting personal information without disclosure to the Web site visitor. Also, NASA management stated that the Agency had not entered into third-party agreements to collect, review, or obtain personally identifiable information relating to any individual's access or viewing habits for Internet sites, and our review did not disclose evidence of such third-party agreements.

However, several privacy issues require management's attention. The persistent cookies we found on NASA's Web sites were not in full compliance with related OMB policies. Also, NASA's Privacy Statement does not contain all the OMB-required elements, and improvements are needed on the management of publicly accessible Web sites. Without improvements in its privacy policies and practices, NASA cannot ensure adequate protection of the privacy rights of its Web site visitors.

#### **Use of Persistent Cookies**

NASA's publicly accessible Web sites use of persistent cookies is not in compliance with OMB policies. OMB Memorandum M-99-18, "Privacy Policies on Federal Web Sites," dated June 2, 1999, provides guidance on Internet privacy issues, directing agencies to post on principal Federal Web sites<sup>9</sup> the privacy policies that disclose the information being collected, why it is collected, and how it will be used. Additionally, OMB Memorandum M-00-13, "Privacy Policies and Data Collection on Federal Web Sites," issued June 22, 2000, provides guidance concerning data collection on Federal Web sites using Web technology that can track the activities of users over time and across different Web sites. One of the most commonly used Web-based technologies to store personal information without the user's consent is the persistent cookie. OMB policy states that persistent cookies should not be used unless there is a clear and conspicuous notice, a compelling need to gather the data on the site, appropriate and publicly disclosed safeguards for handling information derived from cookies, and approval by the head of the agency. The guidelines are applicable even if the persistent cookie does not contain personally identifiable information.

<sup>&</sup>lt;sup>8</sup> According to the National Partnership for Reinventing Government, high-impact agencies handle 90

percent of the Federal Government's contact with the public.

9 Principal Web sites are Internet sites designed as the major entry point for the Agency sites. These include the Agency's home page and any Web page that receives a high number of visits.

We reviewed a total of 49 principal Web sites during January 2001. We selected 28 sites from NASA's most active and visible publicly accessible Web sites list. Additionally, we searched the Internet and judgmentally selected and tested a total of 20 public access Web sites for Kennedy Space Center and Ames Research Center. We also tested the Office of Inspector General Web site. We visited about 600 Web pages related to the 49 principal Web sites visited. We tested all the sites to determine whether the sites (1) collected any personally identifiable information and (2) posted a Privacy Statement consistent with OMB privacy guidelines. Three NASA sites we reviewed contained persistent cookies. We requested written assurances from NASA management about whether use of the persistent cookies complied with the OMB requirements. In response to our review, management disabled one of the three persistent cookies. In all three cases, the cookies did not contain personally identifiable information. However, none of the persistent cookies we identified fully complied with the OMB requirements. For example, no clear and conspicuous notice of their use was given, and the NASA Administrator had not approved the use of any of the cookies. In one case, management stated that NASA should pursue a waiver from the OMB requirements for persistent cookies that do not store any personally identifiable information. Management's written responses did not indicate why the persistent cookies were not in compliance with OMB policies.

#### **Third-Party Agreements**

NASA management provided written assurance to the Office of Inspector General that it has no third-party agreements to collect, review, or obtain personally identifiable information relating to an individual's access or viewing habits for Internet sites. Also, we found no third-party persistent cookies at any of the sites visited during our review.

However, one Center's main Web site contains a link to its Visitor Complex where tickets for visitor attractions may be purchased. This link is to a commercial domain <sup>10</sup> site operated by a NASA contractor. This site contains further links providing information for visitors who are interested in purchasing tickets. Ultimately, a form is displayed requesting the personal information (name, address, etc.) necessary to complete a ticket purchase.

The site where the purchase form is located is in the domain of yet another commercial entity. This site is a commercial Web site with a privacy policy, which states that the NASA contractor will not sell the personal/credit information to any third party. However, the policy states that the contractor reserves the right to sell, trade, or rent the user's email address.

<sup>&</sup>lt;sup>10</sup> A commercial domain is a group of computers and devices on a network that are administered as a unit with common rules and procedures. Within the Internet, domains are defined by their IP address. All devices sharing a common part of the IP address are said to be in the same domain (for example, the nasa.gov domain).

There is no warning to the visitor when he or she departs the NASA domain and enters the series of commercial (.com) sites. <sup>11</sup> Further, each of these commercial domain pages has the NASA Center's name prominently displayed at the top of the page and generally resembles the NASA Center site in appearance. Accordingly, the NASA visitor may not realize that he or she has left the NASA Web site and is now providing detailed personal information to an entity other than NASA. NASA's Web sites should clearly indicate to users when they are about to leave an Agency Web site to link to an outside site.

#### NASA's Web Site Privacy Statement and OMB Policies

NASA's Web site Privacy Statement does not fully implement OMB policies regarding Internet privacy. OMB Memorandums M-99-18 and M-00-13 require every Federal Web site to include links to the agency's privacy policy statement. NASA's policy also requires links to the NASA Privacy Statement. However, during our test, we noticed several sites that did not include a link to the NASA Privacy Statement.

OMB policy states that each Privacy Statement must clearly inform Web site visitors as to what information the agency collects about individuals, why the agency collects it, how the agency will use it, and give clear and conspicuous notice if cookies are used. NASA's Privacy Statement does not address how the Agency will use an individual's information. For example, the Privacy Statement provides no assurance that no further use, other than the one intended or as necessary for security reasons, will be made of information visitors provide on NASA's Web sites. Also, the statement does not address the use of cookies and does not specifically inform visitors that NASA is not responsible for the collection practices of the links it provides on its Web sites. However, some of the Centers' sites used modified versions of the NASA Privacy Statement that more fully comply with OMB policies. For example, the Privacy Statement at the NASA KIDS Web site <sup>12</sup> defines cookies and explains NASA's policy on using cookies. This Privacy Statement also discusses reasons for gathering IP addresses of site visitors. Also, the Kennedy Space Center Privacy Statement <sup>13</sup> more clearly discusses use of personally identifiable information. NASA should revise its Agencywide Privacy Statement to ensure consistency and compliance with OMB privacy policies.

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<sup>&</sup>lt;sup>11</sup> An example of such a warning message can be found at the Marshall Space Flight Center (Marshall), Web site. Prior to departing the site where a link to an external domain has been provided, this message appears:

You are now leaving the Inside Marshall Web site. Inside Marshall provides a link to this external Web page because it may contain related information of interest to you. This link does not constitute an endorsement by MSFC [Marshall] of any information, products or services on this external Web site. You can return to Inside Marshall by using the Back button on your Web browser.

<sup>&</sup>lt;sup>12</sup> The NASA KIDS Web site is at <a href="http://kids.msfc.nasa.gov/Privacy.html">http://kids.msfc.nasa.gov/Privacy.html</a>.

<sup>&</sup>lt;sup>13</sup> The Kennedy Web site is at <a href="http://www-pao.ksc.nasa.gov/kscpao/home/privacy.html">http://www-pao.ksc.nasa.gov/kscpao/home/privacy.html</a>.

#### **Management of Publicly Accessible Web Sites**

NASA does not require the maintenance of a consolidated Agencywide inventory of NASA's publicly accessible Web sites. Therefore, we were not able to reliably determine how many public sites are available, ownership of the sites, or whether the sites are in compliance with NASA's policies. We inquired about the process to approve and establish Web sites on NASA's servers. NASA's guidelines require supervisory approval authorizing release of information to the public. However, each Center decides how to manage and control the publicly accessible Web sites, which can result in inconsistent approaches. Also, one Webmaster<sup>14</sup> indicated that the establishment of a public Web site could occur without supervisory approval. <sup>15</sup> NASA is considered a highimpact agency. For example, the main Agency site alone received a total of 64.1 million visits during the year 2000. NASA's popularity increases the importance of a consistent approach regarding control and management of Web sites available to the public. NASA has not assessed whether all publicly accessible Web sites are in compliance with applicable Federal privacy laws and policies. The Agency is in the process of modifying information technology policies to provide more guidance on Internet issues. These policies should require the establishment of a process to periodically assess whether NASA Web sites comply with applicable Federal privacy laws and policies.

# Recommendations, Management's Response, and Evaluation of Response

#### The NASA Chief Information Officer should:

1. Establish NASA policies regarding the use of persistent cookies as required by OMB policies.

**Management's Response.** Concur. Management responded that NASA has adopted OMB policy as the Agency's policy, which it has issued to all NASA Centers. Management will continue to assess the need for additional Agency policies. The complete text of management's response is in Appendix B.

**Evaluation of Management's Response.** Management's comments are not responsive to the recommendation. NASA does not have a policy specifically addressing the use of persistent cookies at the Agency's public Web sites. As discussed in the finding section of the report, during our testing of NASA's public sites we found persistent cookies that were not in compliance with OMB policies. For example, we found no evidence that the Agency had approved the use of persistent cookies. Accordingly, we request that

<sup>&</sup>lt;sup>14</sup> A Webmaster is the individual managing a Web site.

<sup>&</sup>lt;sup>15</sup> NASA Procedures and Guidelines 2800.1, "Managing Information Technology," states that "Supervisory approval authorizing release of information to the public must be obtained in accordance with NASA's policies. The local NASA Office of Public Affairs should be consulted to determine what authorization is needed."

management reconsider its position and provide additional comments in response to the final report. The recommendation remains unresolved and undispositioned.

2. Establish procedures to monitor the use of persistent cookies to ensure compliance with OMB policies.

**Management's Response.** Nonconcur. Management stated that the Centers are responsible to ensure that Agency policy is being followed. Further, monitoring about 2 million Web pages would not be cost-effective (see Appendix B).

**Evaluation of Management's Response.** Management's comments are not responsive to the recommendation. System scanning tools are available that Webmasters can use to readily identify cookies on their Web sites. Also, according to NASA policy, supervisory approval is required before establishing a publicly accessible Web site. Without procedures and tools to monitor the use of persistent cookies, NASA cannot ensure compliance with OMB policies. We request that management reconsider its position and provide additional comments in response to the final report. The recommendation remains unresolved and undispositioned.

3. Implement Web-based measures to provide clear and conspicuous message warnings to users when leaving the Agency's sites. The message should disclaim NASA's endorsements of the sites and should advise the user that NASA is not responsible for any collection of personal information that may occur at Web sites outside of its domain.

**Management's Response.** Concur. Management stated that current policy requires that a disclaimer be displayed when a NASA site links to external sites. The disclaimer may appear on the pages listing external links or through an intermediate "exit notice" page generated by the server. The Centers are responsible for policy implementation. Management will continue to assess the need for additional Agency policies and procedures (see Appendix B).

**Evaluation of Management's Response.** Management's comments are not responsive to the recommendation. During our testing of Agency Web sites, we found links to commercial sites that looked very similar to Agency sites. No warning was displayed at the point of departure to the commercial sites. In this case, the requirement to provide clear and conspicuous warnings was not met. We request that management provide additional comments in response to the final report. The recommendation remains unresolved and undispositioned.

#### 4. Revise the NASA Web site Privacy Statement to:

- Address the use of cookies, and give a clear and conspicuous notice immediately prior to placing a persistent cookie on the user's computer.
- Address the collection of IP addresses by stating any reasons for collecting them and that any use of collected addresses conforms to OMB policies.
- State that no further use will be made of the information users provide on a NASA Web site, except for the intended use and/or as required by law or if it is pertinent to judicial or governmental investigations or proceedings.
- Expand the present disclaimer for links that are not part of the NASA Web family, or nasa.gov domain, to state that NASA is not responsible for the information collection practices of those sites and that users should read any Privacy Satements at those sites.

**Management's Response.** Partially concur. Management stated that it will address possible revisions of the Web Privacy Statement but that it did not agree with the specific wording in the recommendation (see Appendix B).

**Evaluation of Management's Response.** Management's comments are not responsive to the recommendation. The wording we recommended is already included in several NASA Web site Privacy Statements. However, the Privacy Statement displayed at the Agency's main site did not include any of the elements in our recommendation. We request that management provide additional information on how possible revisions for the Privacy Statement will be addressed. The recommendation remains unresolved and undispositioned.

# 5. Establish and maintain a consolidated inventory of the Agency's publicly accessible Web sites.

**Management's Response.** Nonconcur. Management does not believe it is practical or cost-effective for the NASA CIO to establish or maintain an inventory of sites. Further, the recommendation appears to be outside the scope of the review requested by Congress. However, NASA is looking at alternative approaches to manage the Agency's public Web pages (see Appendix B).

**Evaluation of Management's Response.** Management's comments are not responsive to the recommendation. Without an inventory of its Web sites, the Agency cannot determine whether the sites are in compliance with NASA's policies. We request additional information on the alternative approaches planned for managing the Agency's public Web sites and that management reconsider its position in response to the final report. The recommendation remains unresolved and undispositioned.

6. Emphasize NASA-wide procedures to establish and maintain publicly accessible Web sites, and implement them consistently throughout the Agency.

**Management's Response.** Partially concur. Even though management is looking at alternative approaches for managing the Agency's public Web pages, management does not agree that this process will necessarily result in the adoption of NASA-wide procedures (see Appendix B).

**Evaluation of Management's Response.** Management's comments are not responsive to the recommendation. We believe that without Agencywide procedures, the Centers' approaches for managing and controlling their public Web sites could vary significantly and result in inconsistent implementation of policy. We request that management reconsider its position and provide additional comments in response to the final report. The recommendation remains unresolved and undispositioned.

### Appendix A. Objectives, Scope, and Methodology

#### **Objective**

The objective of this review was to address the reporting requirement established by Public Law 106-554. The law requires that the Inspector General report to the Congress any NASA activity relating to the collection of personally identifiable information by the Agency at its publicly accessible Web sites and any third party agreements made by the Agency, including those with other governmental agencies, to collect, review, or obtain personally identifiable information through the Internet.

#### **Scope and Methodology**

Using Office of Management Budget (OMB) policy regarding Federal Web site privacy and data collection and guidance provided by the President's Council on Integrity and Efficiency (PCIE), we interpreted the congressional reporting requirement to be primarily concerned with personally identifiable information collected from Agency Web sites without disclosure to the site visitor. The persistent cookie is a principal technology for storing information about Web site visitors. Our review methodology was consistent with an approach for reviewing use of cookies by Federal Web sites that the General Accounting Office recommended to the PCIE on February 2, 2001. In performing the review, we obtained a list of NASA's most active and visible publicly accessible Web sites. We did not review the methodology NASA used in identifying the most visited sites. The list contained 54 of the most visited public sites; we judgmentally selected 28 sites for testing. Additionally, we searched the Internet and judgmentally selected and tested a total of 20 public access Web sites for Kennedy Space Center (Kennedy) and Ames Research Center (Ames). The additional sites at Kennedy and Ames were not ones that were on NASA's list of most visited sites. We also tested the Office of Inspector General Web site during our review. We visited about 15 pages for each Web site to determine whether persistent cookies were in use. We tested a total of 49 Web sites and viewed about 600 Web pages associated with these sites. We were unable to determine the total universe of NASA Web sites or pages because NASA management did not have reliable information available. We tested all the sites for use of persistent cookies and for compliance with OMB Web site privacy policies as prescribed in OMB Memorandum M-00-13, issued June 22, 2000. We did not review for the use of other information collection devices.

For sites in which persistent cookies were found, we inquired about whether the cookie contained personally identifiable information. Also, we inquired about NASA's use of cookies in accordance with OMB policies.

We obtained management's written representation concerning any third-party agreements to collect, review, or obtain aggregate lists or singular data containing personally identifiable information related to an individual's access or viewing habits for Web sites.

Although we reviewed NASA's policies and tested numerous NASA Web sites operated by contractors, our scope did not include coverage of contractors' commercial Web sites (.com) that may provide information on NASA programs supported by those contractors. Policy and procedures in this area will be the subject of a future audit.

We reviewed policy for the NASA Privacy Statement to determine whether the policy was consistent with OMB guidelines.

Follow-up work for some issues identified during our review will be included in the Office of Inspector General FY 2002 Audit Plan.

#### **Review Field Work**

We performed the field work for this review during January and February 2001.

## Appendix B. Management's Response

National Aeronautics and Space Administration

Office of the Administrator Washington, DC 20548-0001



FEB 15 2001

TO: W/Assistant Inspector General for Auditing

FROM: AO/Chief Information Officer

SUBJECT: Management Response to Review of Collection of Personally Identifiable

Information on NASA's Web Sites, Assignment Number A0101400

Thank you for the opportunity to provide a management response to the recommendations contained in this report. Each of these recommendations is addressed to the Chief Information Officer (CIO), and our response is from the standpoint of the CIO.

Our firm commitment to respect the privacy of Web visitors, while providing the quality of Web experience that they have come to expect, is continually challenged by rapidly evolving Web technology. Today the focus is on persistent cookies, but tomorrow it might shift to something else; e.g., one-bit tagged images. We must be careful to focus on the principles of privacy and not let excessive attention to one technology allow others that are equally intrusive to emerge unchallenged. At the same time, we must recognize that appropriate use of technologies such as session cookies can enhance the Web experience while fully protecting visitor privacy. An example of this challenge is provided by OMB memorandum M-00-13, Privacy Policies and Data Collection on Federal Web sites, that initially treated all cookies the same and was later modified by a clarifying letter to distinguish between persistent cookies and session cookies.

Our response to the recommendations contained in your report follow:

Recommendation 1: Establish NASA policies regarding the use of persistent cookies as required by OMB policies.

Management response: Concur. We have already adopted the OMB policy as NASA policy and have issued this policy to all NASA Centers. Therefore, we consider this recommendation closed. We will continue to assess the need for additional NASA policies in the evolving area of Web management, including coordination with other stakeholders such as the NASA Webmasters, and will take appropriate action where needed.

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Recommendation 2: "Establish procedures to monitor the use of persistent cookies to ensure compliance with OMB policies."

Management response: Non-concur. NASA's management framework places responsibility at the Centers to ensure that agency policy is being followed. NASA does not believe that the expense of monitoring approximately 2 million Web pages to assure that established policy is being implemented is a cost effective use of Government resources.

Recommendation 3: "Implement Web-based measures to provide clear and conspicuous message warnings to users when leaving the Agency's sites..."

Management response: Concur. Current NASA policy already requires that a disclaimer be displayed when a NASA site links to external sites. The disclaimer may appear on the pages listing external links or through an intermediate "exit notice" page generated by the server. Therefore, we consider this recommendation closed as addressed to the CIO. Implementation is the responsibility of the Centers as indicated in our response to recommendation one. Consistent with our response to recommendation one, we will continue to assess the need for additional NASA policies and procedures in the evolving area of Web management and will take appropriate action where needed.

Recommendation 4: "Revise the NASA Web site Privacy Statement..."

Management response: Partially concur. We will address possible revisions of the Web privacy statement as part of our established policy process. We do not concur that we will include the specific wording contained in the recommendation. Any proposed revisions will take into account law, regulation, and policy at the time they are formulated and will be adopted using NASA's standard policy development process.

Recommendation 5: "Establish and maintain a consolidated inventory of the Agency's publicly accessible Web sites."

Management response: Non-concur. We do not believe it is practical or cost-effective for the NASA CIO to establish or maintain an inventory of sites, and we are unable to identify any finding in the audit that would justify this recommendation. This recommendation appears to be outside the scope of the review requested by Congress. NASA is currently looking at alternative approaches for managing our 2 million public Web pages and will consider this recommendation as part of our process.

Recommendation 6: "Emphasize NASA-wide procedures to establish and maintain accessible Web sites, and implement them consistently throughout the Agency."

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Management response: Partially concur. NASA is currently looking at alternative approaches for managing our 2 million publicly accessible Web pages and will consider the recommendation as part of our process. We do not concur that the outcome of our process will necessarily adopt NASA-wide procedures.

<sup>&</sup>lt;sup>1</sup> June 27, 2001 transmittal to all NASA ClOs of OMB memorandum M-00-13, Privacy Policies and Data Collection on Federal Web Sites.

\* NASA Procedures and Guidance NPG2800.1, "Managing Information Technology," Section 2.6.1.

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**Report Title:** Review of the Collection of Personally Identifiable

Information on Nasa's Web Sites

**Report Number:** IG-01-008 **Report Date:** February 16, 2001

*Circle the appropriate rating for the following statements.* 

		Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	N/A
1.	The report was clear, readable, and logically organized.	5	4	3	2	1	N/A
2.	The report was concise and to the point.	5	4	3	2	1	N/A
3.	We effectively communicated the audit objectives, scope, and methodology.	5	4	3	2	1	N/A
4.	The report contained sufficient information to support the finding(s) in a balanced and objective manner.	5	4	3	2	1	N/A

#### Overall, how would you rate the report?

Excellent	Fair
Very Good	Poor
Good	

If you have any additional comments or wish to elaborate on any of the above								
responses, please write them here.	Use additional paper if necessary.							
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How did you use the report?		
, <u> </u>		
How could we improve our report?		
How would you identify yourself? (Selec	ct one)	
110 would you dentify yourself. (See	er one)	
Congressional Staff	Media	
NASA Employee	Public Interest	
Private Citizen	Other:	
Government: Federal: _	State:	Local:
May we contact you about your commen	rte?	
may we comment you doom your comment		
Yes:	No:	
Name:		
ivanic		
Thank you for your cooperation in comple	eting this survey.	

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