



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).

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.

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	When applicants apply via grants.gov, they can decline to provide an SSN.

have to decline to provide information or to consent to particular uses of the information?	However, individual applicants who are awarded a grant (or panelists who are 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.	
Signature of NEH Chief Privacy Officer	This system is (circle one): approved not approved