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## 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:	Oracle Accounting System
Date PIA Conducted:	July 27, 2006
Name and Office of Person(s) Interviewed for PIA	<ol> <li>John Gleason, Director of Accounting was interviewed by Brett Bobley, Chief Privacy Officer, July 27, 2006.</li> <li>Heather Gottry, General Counsel, was interviewed by Brett Bobley on August 1, 2006.</li> <li>Barry Maynes, Agency Records Officer, had telephone and in-person conversations with Brett Bobley on 7/31/06 and 8/2/06.</li> </ol>
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	Oracle provides the agency with a detailed SAS-70 that describes the security
secured (e.g., administrative and	controls they have in place. The agency also has developed a local role-based
technological controls)?	security policy for the system.
Is a system of records being	After discussions with the agency General Counsel, it was determined that the
created under the Privacy Act, 5	agency's list of official systems of records needs to be updated. At the time
U.S.C. 552a.?	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	Even though Oracle is not listed as a system of record, the records it produces
records created by this new	are consistent with the ones produced by the previous system. As per the
system?	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.	
Gi CANTAL GI : CD :	
Signature of NEH Chief Privacy	This system is (circle one): approved not approved
Officer	