



Integration: Records Management & Privacy

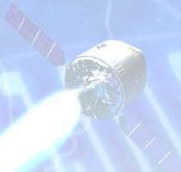
Office of the Chief Information Officer

RACO 2008

Patti Stockman
NASA Records & Privacy Act Officer
Patti.F.Stockman@nasa.gov

202-358-4787

May 6, 2008



Agenda

Office of the Chief Information Officer

- **Privacy requirements drivers**
- **How much integration is practical?**
- **Privacy requirements universe**
- **Records management integration opportunities**
- **Summary**



Privacy Requirements Drivers

Office of the Chief Information Officer

- **Privacy Act of 1974 (PA)**
- **E-Government Act of 2002 (E-Gov Act)**
- **Children's Online Privacy Protection Act of 1998 (COPPA)**
- **Paperwork Reduction Act of 1995 (PRA)**
- **Numerous OMB instructions**



How much integration is practical?

Office of the Chief Information Officer

- **Records management and privacy management**
 - Both demanding endeavors
 - Each requires multiple people
- **Combining into one position is problematic.**
- **However...**
 - there *are* areas of common ground that present great opportunities for collaboration!
 - Same organization works well.



Privacy Requirements Universe

Office of the Chief Information Officer

Meeting Privacy requirements involves expertise from two primary realms:

- **Information Management**

Subject and user notifications, access rights, system assessments, rules of conduct, etc.

- **IT Security**

Encryption, two-factor authentication, remote access time-out, other security controls, etc.



Privacy Requirements: RM Integration Opportunity 1

Office of the Chief Information Officer

Privacy Act concerns “Systems of Records” (SORs)

- information about an individual ... from which
- information is retrieved by individual’s name or identifying number, symbol, or other identifying particular assigned to the individual.

Requirement:

- Federal Register SORs Notices (including thorough records description and retention information)

Opportunity – Partner with records management:

- To schedule records covered by the Privacy Act
- To provide input to SOR description of records for FR notice



Privacy Requirements: RM Integration Opportunity 2

Office of the Chief Information Officer

E-Gov Act Requires:

Privacy Impact Assessment (PIA) - analysis of how information is handled to ensure privacy requirements compliance, determine risks, and alternatives.

- Required of all electronic Information Systems that collect, maintain, or distribute information in identifiable form (IIF) on members of the public.
- **Problem:** In order to know whether a PIA is required, system owner must know whether the applications contain IIF.
- **Opportunity:** Devise agency application/system information analysis to determine the nature of information the application will collect/maintain – including records.



In Summary

Office of the Chief Information Officer

- **Records Management and Privacy both concern information management.**
- **Look for leverage points in processes required by other information functions.**
- **Agencies should work toward holistic approach to controlling and managing information.**