



National Science Foundation

eJacket

Privacy Impact Assessment

Version: 1.0

Date: 11/26/2007

Table of Contents

1. BACKGROUND	1
1.1 ORGANIZATIONAL BACKGROUND	1
2. SCOPE	1
3. ENVIRONMENT	1
3.1 DATA IN THE SYSTEM	2
3.2 ACCESS TO THE DATA	4
3.3 ATTRIBUTES OF THE DATA	5
3.4 MAINTENANCE OF ADMINISTRATIVE CONTROLS	7

Revisions

Revision Number	Author(s)	Date	Description
1.0	Leslie Meserve	11/26/2007	v 1.0

1. BACKGROUND

The National Science Foundation (NSF) recognizes the importance of protecting the privacy of its information systems. Privacy issues must be addressed when systems are being developed, and privacy protections must be integrated into the development life cycle of these automated systems.

This eJacket major application Privacy Impact Assessment (PIA) addresses privacy requirements during the application's lifecycle process.

1.1 Organizational Background

eJacket falls under NSF's PRAMIS umbrella investment for implementing next generation information technology capabilities. eJacket is a key module of PRAMIS.

eJacket (<http://www.ejacket.nsf.gov>) is an internal Web-based proposal processing/grants management system used by internal NSF staff members to process NSF proposals and manage post award activities.

2. SCOPE

Protecting an individual's right to privacy is predicated on various Federal laws, directives, and standards; the overarching Federal laws being the Privacy Act of 1974 and the more recent E-Government Act of 2002. Federal guidance requires that, where possible, the PIA process be integrated into the general support system/major application (GSS/MA) life cycle.

3. ENVIRONMENT

eJacket is a Web-based and interactive real-time system used to conduct NSF business over the Internet. eJacket covers a wide range activities by NSF staff for processing proposals from receipt through (non award) final action, and processing post award activities. eJacket processing environments include Development, Acceptance, and Production. eJacket team leaders use the Rational Software® tools for managing eJacket upgrades and enhancements.

eJacket is accessible via the NSF internal network and remote access (RLS and www.ejacket.nsf.gov with two-factor authentication). Objects include FastLane servers, the eJacket application, the SQL support database, system routines, support programs and user class data set access levels (with similar security access enforced by security control policies).

3.1 Data in the System

The sources of the system information are an important privacy consideration. The information becomes especially important if the data is gathered from other than NSF records. Information collected from non-NSF sources should be verified, to the extent practicable, for accuracy, that the information is current, and the information is complete. Accurate information is important if the information will be used to make determinations about individuals.

Privacy Criteria	Descriptive Response
1. Provide a general description of the information type (i.e., persons name, SSN, etc.) to be collected or processed by the GSS or MA.	eJacket does not directly collect information from sources outside of NSF, although it does utilize information from the FastLane database which utilizes information provided by authorized external users (i.e., scientists, educators, technology experts, research administrators, graduate students, and panelists) via FastLane over the public Internet. Proposal and award related information is processed by eJacket via the following areas of functionality (electronic correspondence, proposal administration/management, review processing, budget, recommendation processing, administrative review, electronic sign-off, and administration of post award activities). This functionality requires the use of names, mailing addresses, and email addresses where necessary for business purposes.
2. What are the sources of the information in the system? (Note: This is an important privacy consideration if the data is gathered from other than NSF records).	eJacket utilizes information from internal NSF databases, including the FastLane database, which utilizes information provided by authorized external users (i.e., scientists, educators, technology experts, research administrators, graduate students, and panelists) via FastLane over the public Internet.
3. What NSF files and databases are used?	eJacket uses the PARS (Proposal and Reviewer System), FastLane, FAS (Financial Accounting System), UPM (User Profile Maintenance system), and PRAMIS databases.
4. What other Federal Agencies, if any, are providing data for use in the system?	Other Federal agencies do not have access to or input data to eJacket.
5. From what other third party	eJacket does not collect data from other third party

Privacy Criteria	Descriptive Response
sources will data be collected?	sources.
6. What information will be collected from the employee?	eJacket does not collect information from NSF employees.
7. If data is collected from sources other than NSF records, how is it being verified for accuracy? <i>(Note: This is especially important if the information will be used to make determinations about individuals).</i>	eJacket utilizes information from internal NSF databases, including the FastLane database, which utilizes information provided by authorized external users (i.e., scientists, educators, technology experts, research administrators, graduate students, and panelists) via FastLane over the public Internet. Since the information is submitted directly by the source, accuracy is ensured. Internal users enter additional information into eJacket related to the actions they are processing (i.e., coding, classification, recommendations, approvals, electronic signoff, etc.), as part of the normal ebusiness process.
8. How will data be checked for completeness?	eJacket is an interactive web-based application that enforces edits and business rules which check for data completeness.
9. Is the data current? How do you know? What mechanisms were used to validate the data's currency?	eJacket utilizes information from internal NSF databases, including the FastLane database, which allows external users (PIs, Reviewers, Panelists, etc.) to update appropriate contact information, and keep data current. As well, proposal file update functionality allows appropriate external users to update proposal files under specific conditions. Internal users can view information on-line and make corrections to specific types of data, if needed (with appropriate authority, under specific conditions). This capability provides the opportunity to correct inaccurate information, when needed.
10. What data elements are described? What level of detail is used in documenting data elements?	The eJacket data dictionary contains a list of all data fields used by the system. The eJacket data dictionary includes data name, data type (i.e., alpha numeric or text), and data length.
11. If data elements are documented, what is the name of the document?	The eJacket data dictionary.

3.2 Access to the Data

Who has access to the data in a system must be defined and documented. Users of the data can be individuals, other systems, and other agencies. Individuals who have access to the data can be system users, system administrators, system owners, managers, and developers. When individuals are granted access to a system, their access should be limited, where possible, to only that data needed to perform their assigned duties. If individuals are granted access to all of the data in a system, procedures need to be in place to deter and detect browsing and unauthorized access. Other systems are any programs or projects that interface with the system and have access to the data.

Privacy Criteria	Descriptive Response
<p>1. Who has access to the data in the system? <i>(Note: Users of the data can be individuals, other systems, programs, projects, or other agencies. Individuals who have access to the data can be system users, system administrators, system owners, managers, and developers).</i></p>	<p>Access to eJacket is limited to authorized users. System administrators, database administrators, and some members of the NSF operational (i.e., Division of Information Systems) support teams also have access to eJacket or to the data utilized by eJacket.</p>
<p>2. Where individuals are granted access to all of the data in a system, what procedures are in place to deter and detect browsing and unauthorized access?</p>	<p>User access to data in eJacket is controlled via NSF's custom-built User Profile Maintenance application (UPM) application which determines what information and records a specific NSF user has view and/or update access to, and what tasks they are authorized to perform based on their job responsibilities. This access is limited to only the functions required to complete their job responsibilities. eJacket displays NSF's policy regarding access to sensitive and PIA information on its login screen. As well, each display of a proposal or award jacket is tracked for audit purposes. Database administrators also have access to all the data on the database, and are trained to know what is considered proper access; and, the use of query tools is tracked by monitoring software.</p>
<p>3. When individuals are granted access to a system, how is their access being limited, where possible, to only that data needed to perform their assigned</p>	<p>eJacket users have access to functionality needed to conduct their job responsibilities. This access is based on their role as controlled via the User Profile Maintenance application.</p>

Privacy Criteria	Descriptive Response
duties?	
4. How or what tools are used to determine a user's data access?	eJacket users access to information is limited by the permissions assigned them by their organization, or based on their role.
5. Describe the criteria, the procedures, the controls, and the responsibilities in place regarding the manner in which data access is documented.	Internal NSF users cannot use eJacket until provided with an NSF-assigned user ID and provided with appropriate job class authorities and roles via the User Profile Maintenance application. Assignment of appropriate job class authorities and roles is controlled by an authorized user within each organization.
6. Do other systems share data or have access to data in this system? If yes, explain.	eJacket interfaces with the NSF Financial Accounting System (FAS), FastLane, Panel Admin, Integrated Panel System, NSF Proposal, Principal Investigator, and Reviewer System (PARS), Awards System, and FastLane Internal Applications.
7. Who has the responsibility for protecting the privacy rights of the individuals affected by any system interface?	The NSF Division of Information Systems (DIS) is responsible for protecting the rights of the individuals affected by any system interface. The DIS coordinates very closely with the NSF Office of the General Counsel on all privacy issues.
8. Will other agencies share data or have access to data in this system?	No other agency shares or has access to data in the eJacket system.
9. How will the NSF use this data?	eJacket utilizes data to view and process proposals, and to administer Post Award activities.
10. Who is responsible for assuring proper use of the data?	eJacket users insure proper use of it's data.
11. How will the system ensure that agencies only get the information they are entitled to?	External agencies do not have access to eJacket information.

3.3 Attributes of the Data

When requirements for the data to be used in the system are being determined, those requirements must include the privacy attributes of the data. The privacy attributes are derived from the legal requirements imposed by the Privacy Act of 1974. First, the data

must be *relevant and necessary* to accomplish the purpose of the system. Second, the data must be *complete, accurate and timely*. It is important to ensure the data has these privacy attributes in order to assure fairness to the individual in making decisions based on the data.

Privacy Criteria	Descriptive Response
1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?	eJacket is designed to display and support processing of proposals submitted to NSF and manage post award administrative activities. These activities support the NSF proposal lifecycle.
2. Will the system derive new data or create previously unavailable data about an individual through aggregation for the information collected?	eJacket does not derive or create new data about an individual through aggregation. It does utilize data aggregated from several different databases to generate reports for users (i.e., through MyWork and Search functionality). The purpose of these reports is to facilitate and automate proposal processing and post award administration.
3. Will the new data be placed in the individual's record?	eJacket does not create new data,
4. Can the system make determinations that would not be possible without the new data?	eJacket does not make determinations about data, and does not create new data.
5. How will the new data be verified for relevance and accuracy?	N/A
6. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	eJacket does not consolidate data. It utilizes data from several different NSF owned databases. User access to data in eJacket is controlled via NSF's custom-built User Profile Maintenance application (UPM) application which determines what information and records a specific internal NSF user has view and/or update access to, and what tasks they are authorized to perform based on their job responsibilities. Database administrators also have access to the data.
7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain	eJacket is not consolidating processes. Stove pipe legacy applications are being re-written and re-designed to fit into eJacket using the same controls that eJacket already has in

Privacy Criteria	Descriptive Response
	place to secure data and prevent unauthorized access.
8. How will the data be retrieved? Can the data be retrieved using a personal identifier (i.e., name, address, etc.)? If yes, explain.	Users with appropriate access to eJacket can search and retrieve proposal and project report data using a personal identifier (i.e., PI name, PI ID, etc.).
9. What are the potential effects on the due process rights of individuals with respect to the following: <ul style="list-style-type: none"> • Consolidation and linkage of files and systems; • Derivation of data; • Accelerated information processing and decision-making; • Use of new technologies? 	eJacket does not consolidate data, link files and systems, derive data or accelerate information processing.
10. How will these affects be mitigated?	There are no affects needing mitigation.

3.4 Maintenance of Administrative Controls

Automation of systems can lead to the consolidation of processes, data, and the controls in place to protect the data. When administrative controls are consolidated, they should be evaluated so that all necessary controls remain in place to the degree necessary to continue to control access to and use of the data.

Data retention procedures should be documented. Data retention procedures require review to ensure they meet statutory requirements. Rules must be established for the length of time information is kept and for assuring that it is properly eliminated (i.e., archived, deleted, etc.) at the end of that time.

The intended and potential monitoring capabilities of a system must be defined and safeguards must be installed to ensure privacy and prevent unnecessary intrusion.

Privacy Criteria	Descriptive Response
1. Explain how the system and its use will ensure equitable treatment of individuals.	eJacket supports the merit review process which ensures equitable treatment of individuals. All awards are based upon a merit process. Awards are peer-reviewed; the program staff makes award suggestions; and then the division director must concur with the decision before the proposal is routed to

Privacy Criteria	Descriptive Response
	NSF's Division of Grants and Agreement for award.
2. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	eJacket is operated and maintained at <u>one</u> location, the NSF headquarters office in Arlington, VA.
3. Explain any possibilities of disparate treatment of individuals or groups.	eJacket processing does not create possibilities for disparate treatment of individuals or groups.
4. What are the retention periods of data in this system?	eJacket data related to awarded proposals is retained indefinitely. Five years after the year a proposal is declined, NSF plans to retain only minimal information related to the declined proposal.
5. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	At this point, eJacket data has never been removed (archived). However, future plans include electronically archiving records at the National Archives.
6. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	eJacket maintains point in time information for all transactions and for auditing purposes. Internal users determine what information eJacket processes. Therefore, all data is accurate at the time it is used for the transaction.
7. Is the system using technologies in ways that NSF has not previously employed? How does the use of this technology affect individual's privacy?	eJacket is not using new technologies that NSF has not previously employed.
8. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	eJacket does not provide identification, location, or monitoring of individuals.
9. Will this system provide the capability to identify, locate and monitor groups of people? If yes explain.	eJacket does not provide the capability to identify, locate, or monitor groups of people.
10. What controls will be used to prevent unauthorized monitoring?	eJacket does not provide the capability to identify, locate, or monitor groups of people.
11. Under which System of Record notice	Systems of Records:

Privacy Criteria	Descriptive Response
does the system operate? Provide number and name.	<p>NSF-12, "Fellowships and Other Awards" (Federal Register Vol. 63, No. 2, Jan 5, 1998).</p> <p>NSF-50, "Principal Investigator/Proposal File and Associated Records," 69 Federal Register 26410 (May 12, 2004)</p> <p>NSF-51, "Reviewer/Proposal File and Associated Records," 69 Federal Register 26410 (May 12, 2004)</p>
12. If the system is being modified, will the System of Record require amendment or revision? Explain	The System of Record does not require revision.

Additional Assistance

For additional assistance with completing this assessment, you may contact NSF Privacy Act Officer, Leslie Jensen, at 703 292 5065 or the NSF Privacy Advocate, Mary Lou Tillotson, at 703 292 4264.

Review

When the PIA is complete, please submit the PIA to the NSF Privacy Act Officer for review at ljensen@nsf.gov and to the NSF Privacy Advocate at mtillots@nsf.gov.