
National Science Foundation



FastLane Major Application

Privacy Impact Assessment

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Revisions

Revision Number	Author	Date	Description
1	M Tillotson	April 26, 2007	Updated SORN list, page 8.

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 FastLane major application Privacy Impact Assessment (PIA) establishes requirements for addressing privacy during the application's lifecycle process; it defines and documents the privacy issues the application must address and outline; and serves as part of the Certification and Accreditation (C&A) process.

1.1 Organizational Background

FastLane (<http://www.fastlane.nsf.gov>) is a web-based grants management system used by over 250,000 scientists, educators, technology experts and administrators, including the country's top researchers, to prepare and submit NSF proposals for funding, check on the status of their proposals, peer-review these proposals, prepare and submit revised budgets and post-award notifications, and report on the progress of their government-funded research. Organizations can also request funding increments and report on billions of dollars in expenditures through FastLane.

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. This PIA is base-lined using instruction from the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-64, *Security Considerations in the Information System Development Life Cycle* and other Federal guidance.

3. ENVIRONMENT

A critical component of completing the C&A process is categorizing the information type(s) that the GSS or MA processes. An information type is defined as "*a specific category of information (e.g., privacy, medical, proprietary, financial, investigative, contractor sensitive, security management), defined by an organization or in some instances, by a specific law, Executive Order, directive, policy, or regulation*¹." Some NSF GSSs/MAs process privacy information. Thus, this PIA serves to determine to what extent this privacy information must be adequately protected.

¹ FIPS 199, Standards for Security Categorization of Federal Information and Information Systems, December 2003

4. PRIVACY IMPACT ASSESSMENT CRITERIA

The following sections contain the appropriate questions that are used to collect the required GSS/MA information. The NSF Privacy Officer and other reviewing officials will analyze the results to ensure that an individual's personal identifiable information is adequately secure. The completed PIA will be forwarded to the appropriate individuals for review, signature, and approval. Once approved, the PIA will be included as an appendix in the GSS/MA system security plan.

4.1 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.	FastLane processes proposal, payments, Federal Grants Management (non-State), award management and oversight, and reporting information. These information types are documented in the <i>NSF FastLane Information Categorization and Sensitivity Assessment</i> , dated November 15, 2004. This includes name, address, e-mail, and SSN or pseudo-SSN (9 digit number that begins with 3 zeroes that NSF can provide to Principal Investigators and Sponsored Research Office officials who do not want to supply their SSN. Panelists must supply their SSN in order to get compensated by NSF). This information is routinely reviewed and updated by the DIS Security team and the FastLane Branch Chief.
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).	FastLane stores information that is provided by authorized external users (i.e., scientists, educators, technology experts, research administrators, graduate students, and panelists) over the public Internet.
3. What NSF files and databases are used?	FastLane uses the FastLane database as well as the Principal Investigator (PI), reviewer, award, institution, and financial 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 FastLane.
5. From what other third party sources will data be collected?	FastLane does not collect data from other third party sources.

Privacy Criteria	Descriptive Response
6. What information will be collected from the employee?	FastLane does not collect information from NSF employees. FastLane collects and stores information from external users preparing, submitting, or reviewing, grant proposals or administering awards.
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>).	FastLane does not collect information from any sources other than those mentioned previously in question number two (above). Beginning in June 2005 NSF is providing external organizations the opportunity to submit proposals to NSF for 23 programs through the Grants.gov website. NSF's automated process that takes the proposal from Grants.gov and puts it into the NSF database has detailed date edits that augment the data edits applied by Grants.gov.
8. How will data be checked for completeness?	FastLane 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?	FastLane users can review and update their proposal, PI and reviewer information on-line. This capability provides the opportunity to insure information accuracy.
10. What data elements are described? What level of detail is used in documenting data elements?	The FastLane data dictionary contains a list of all data fields used by the system. The FastLane 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 FastLane data dictionary.

4.2 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
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</i>	Access to FastLane is limited to authorized internal and external users. These users include the FastLane system administrators, database

Privacy Criteria	Descriptive Response
<p><i>agencies. Individuals who have access to the data can be system users, system administrators, system owners, managers, and developers).</i></p>	<p>administrators, and some members of the NSF operational (i.e., Infrastructure Management Branch) support teams.</p> <p>The External System Branch (ESB) manages FastLane. In addition, the NSF Division of Information Systems (DIS) staff works with various organizations to establish the initial ability to access FastLane. When an institution registers with FastLane, the institution is required to obtain the signature of an Authorized Organizational Representative. The Authorized Organizational Representative and other institutional personnel, as designated by the Authorized Organizational Representative, agree to accept the responsibilities of the privacy and confidentiality incurred with the FastLane system.</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>Users have access to only those FastLane functions required to complete their job responsibilities. Principle investigators, research administrators, reviewers, program officers and their designees have specialized access to restricted FastLane functions. Only the FastLane database administrators have access to all of the data in the FastLane database. The FastLane DBAs 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 duties?</p>	<p>FastLane users have access to only those functions they need to conduct their job responsibilities. Specific roles (i.e., principle investigators, program officers, etc.) have only the permissions required to complete their FastLane responsibilities.</p>
<p>4. How or what tools are used to determine a user's data access?</p>	<p>FastLane users access to information is limited by the permissions assigned them by their organization.</p>
<p>5. Describe the criteria, the procedures, the controls, and the responsibilities in place regarding the manner in which data access is documented.</p>	<p>Organizations cannot use FastLane until they register and the registration is accepted. FastLane data access is documented in the registration form that is completed online; signed by the organization's Authorized Organizational</p>

Privacy Criteria	Descriptive Response
	Representative; faxed to NSF; reviewed by NSF; and then accepted or rejected and stored.
6. Do other systems share data or have access to data in this system? If yes, explain.	<p>FastLane interfaces with the NSF Financial Accounting System (FAS) MA to process cash advance requests, Federal Cash Transaction Quarterly Reports, and travel payment requests.</p> <p>FastLane interfaces with the NSF Proposal, Principal Investigator, and Reviewer System (PARS) MA for proposal, Principal Investigator/CO-Principal Investigator (PI/CO-PI), panel and review information.</p> <p>The NSF Electronic-Jacket MA accesses FastLane to retrieve PDF files and to dynamically generate Electronic-Jacket information.</p>
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?	Under the Grants Management Line of Business (GMLoB), it is envisioned that NSF will be part of a consortium of agencies that will leverage other agencies applications and data.
9. How will the NSF use this data?	NSF uses FastLane data to process, review, and award proposals and to administer awards.
10. Who is responsible for assuring proper use of the data?	External users (i.e., scientists, educators, technology experts and administrators); internal NSF operational teams (i.e., IMB, TCB); and NSF users insure proper use of FastLane data.
11. How will the system ensure that agencies only get the information they are entitled to?	External agencies do not have access to FastLane information.

4.3 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?	FastLane data supports the NSF proposal lifecycle and provides data for NSF financial purposes.
2. Will the system derive new data or create previously unavailable data about an individual through aggregation for the information collected?	FastLane does not derive or create new data about an individual through aggregation. FastLane is designed to facilitate and automate the proposal development and submission, merit review, and award administration processes.
3. Will the new data be placed in the individual's record?	FastLane does not create new data.
4. Can the system make determinations that would not be possible without the new data?	FastLane does not create new data that would allow determinations to be made.
5. How will the new data be verified for relevance and accuracy?	FastLane users have the capability to review their information online. In addition, they can change their information online.
6. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	FastLane data is not consolidated. NSF access to information submitted via FastLane is via custom-built applications that use NSF's custom-built User Profile Maintenance (UPM) application to determine which information a specific internal NSF user can see. Database administrators have access to the data; the Authorized Organizational Representative and their designees assign data access to the organizational users.
7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain	FastLane data consolidation does not occur.
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 can retrieve their own data through FastLane if they are a registered FastLane user. Principal Investigators and Sponsored Research Office officials log into FastLane using their last name; social security number (SSN) or pseudo SSN (a nine digit number that NSF provides that begins with three zeroes (real SSNs do not begin with

Privacy Criteria	Descriptive Response
	three zeroes); and password.
<p>9. What are the potential effects on the due process rights of individuals with respect to the following:</p> <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? 	<p>Two Privacy Act Systems of Records (SORs) cover the PI database and the Reviewer database, NSF-50 Principal Investigator/Proposal File and Associated Records and NSF-51 Reviewer/Proposal File and Associated Records. NSF-51 is a subsystem of NSF-50. These two systems do not derive new data. FastLane does not make use of new technologies that have not been previously employed by NSF.</p>
<p>10. How will these affects be mitigated?</p>	<p>There are no affects needing mitigation.</p>

4.4 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
<p>1. Explain how the system and its use will ensure equitable treatment of individuals.</p>	<p>FastLane 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 NSF’s Division of Grants and Agreement for award.</p>
<p>2. If the system is operated in more than one site, how will consistent use of the system</p>	<p>FastLane is operated and maintained at <u>one</u> location, the NSF headquarters office in Arlington,</p>

Privacy Criteria	Descriptive Response
and data be maintained in all sites?	VA.
3. Explain any possibilities of disparate treatment of individuals or groups.	FastLane processing does not create possibilities for disparate treatment of individuals or groups.
4. What are the retention periods of data in this system?	FastLane 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, FastLane 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?	FastLane maintains point in time information for all transactions and for auditing purposes. External users determine what information FastLane 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?	FastLane 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.	FastLane 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.	FastLane does not provide the capability to identify, locate, or monitor groups of people.
10. What controls will be used to prevent unauthorized monitoring?	FastLane does not provide the capability to identify, locate, or monitor groups of people.
11. Under which System of Record notice does the system operate? Provide number and name.	See Systems of Records, NSF-50, "Principal Investigator/Proposal File and Associated Records," 69 Federal Register 26410 (May 12, 2004), and NSF-51, "Reviewer/Proposal File and Associated Records," 69 Federal Register 26410 (May 12, 2004), NSF-12, "Fellowships and Other Awards" (Federal Register Vol. 63, No. 2, Jan 5, 1998).

Privacy Criteria	Descriptive Response
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 DIS Security at 703 292 4225.

Review Authority

Ensure that the appropriate signatures are documented prior to forwarding to the NSF Privacy Officer

NSF Privacy Act Officer

Date: _____ Name: _____

Comments:

Program Manager Review

Date: _____ Name: _____

Comments:

System Owner Review

Date: _____ Name: _____

Comments: cc: FastLane System Security Plan