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NASA Procedural Requirements

COMPLIANCE IS MANDATORY

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| [TOC](#) | [ChangeHistory](#) | [Preface](#) | [Chapter1](#) | [Chapter2](#) | [Chapter3](#) |
[Chapter4](#) | [Chapter5](#) | [AppendixA](#) | [AppendixB](#) | [AppendixC](#) | [AppendixD](#) |
[AppendixE](#) | [AppendixF](#) | [AppendixG](#) | [AppendixH](#) | [AppendixI](#) | [ALL](#) |

Chapter 3. Privacy Impact Assessments

3.1 General

Because the E-Gov Act prescribes PIAs for IT systems relative to their collection and/or maintenance of IIF, this chapter uses the term IIF for discussing information collected on individuals.

3.1.1 NASA has developed an assessment tool called the Information and Privacy Threshold Analysis (IPTA) to evaluate the nature of the information to be collected and maintained in applications and IT systems. Answers to the IPTA questions allow the determination of what actions must be taken to comply with applicable statutes, including the completion of a PIA.

3.1.2 A PIA, required by the E-Gov Act as well as by NIST SP 800-53 for IT Security C&A, is a process through which system owners analyze how information is managed to ensure that its handling conforms to applicable statutory, regulatory, and policy requirements regarding privacy and to determine the risks and effects of collecting, maintaining, and disseminating IIF. In addition, the PIA examines and documents the evaluation of protections and alternative processes for handling information to mitigate potential privacy risks.

3.2 When to Conduct an IPTA

3.2.1 Prior to application development, procurement, or modification, all application owners shall complete the IPTA that is available through the NASA Privacy Web site located at http://insidenasa.nasa.gov/ocio/information/info_privacy/index.html.

3.2.2 Prior to system development, procurement, or modification, all system owners shall complete, at a minimum, the IPTA that is available through the NASA Privacy Web site. The results of the IPTA responses will indicate whether the application owner and/or system owner must complete a PIA.

3.2.3 If the completed IPTA for a system does not indicate the need for a PIA, the IT system owner shall retain the record copy, submit a copy of the completed IPTA(s) for the IT Security C&A process, and provide information copies to the Center Privacy Act

Manager (PAM) and Center Records Manager.

3.3 When to Conduct a PIA

Prior to system development, procurement, or modification, system owners shall, in collaboration with their application owners and NASA cognizant officials, conduct PIAs for all new systems or significantly modified systems under the following circumstances:

- a. When the system will collect, maintain, or disseminate IIF from or about members of the public, excluding contractors and partners.
- b. When initiating a new electronic collection of IIF for 10 or more persons (excluding agencies, instrumentalities, or employees of the Federal Government) that is subject to the PRA.
- c. When the system will contain IIF or PII on any individuals, and the system requires an enterprise architecture (EA) review as prescribed by NPR 2830.1, NASA Enterprise Architecture Procedures.
- d. When existing systems meeting one of the above criteria are changed such that the change creates new privacy risks. Examples of such changes are provided in Appendix F.

3.4 When PIAs are not Required

A PIA is not required if any of the following circumstances exist:

- a. The system has not undergone significant revision since April 2003 when the E-Gov Act was enacted.
- b. A system has been previously assessed under an evaluation similar to a PIA.
- c. The system's privacy issues are unchanged. Examples of such instances are provided in Appendix F.

3.5 Conducting a PIA

Discussion of how to conduct a PIA is contained in Appendix F.

3.6 Review, Approval, and Publication of a PIA

3.6.1 System owners shall submit the fully completed PIA worksheet and summary to the NASA Privacy Act Officer through the Center PAM and Center CIO.

3.6.2 The NASA Privacy Act Officer shall review fully completed PIA worksheets and summaries.

3.6.3 The NASA CIO shall approve all fully completed PIAs and make publicly available through the NASA privacy Web site those PIAs that concern applications/systems collecting or maintaining IIF on members of the public, retaining the record copy and providing a copy of the approved PIA to the Center CIO for the system owner's files.

3.6.4 The NASA CIO may determine not to make the PIA document or summary publicly available when publication would raise security concerns, reveal classified (i.e., national security) information, or disclose sensitive information (e.g., potentially damaging to national interest, law enforcement effort, or competitive business interest).

3.7 Relationship to Requirements under the PRA

Numerous similarities exist between information required in a PIA and that required for application for PRA authorization. The relationship between the two processes and steps to minimize duplicative effort is addressed in Appendix F.

3.8 Relationship to Requirements under the Privacy Act

There are numerous similarities between information required in a PIA and that required for Privacy Act SORN. Measures to minimize duplicative effort are addressed in Appendix F.

[TOC](#)	[ChangeHistory](#)	[Preface](#)	[Chapter1](#)	[Chapter2](#)	[Chapter3](#)
[Chapter4](#)	[Chapter5](#)	[AppendixA](#)	[AppendixB](#)	[AppendixC](#)	
[AppendixD](#)	[AppendixE](#)	[AppendixF](#)	[AppendixG](#)	[AppendixH](#)	
[AppendixI](#)	[ALL](#)				

| [NODIS Library](#) | [Organization and Administration\(1000s\)](#) | [Search](#)
|

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