

# Privacy Impact Assessment (PIA)

## I. System Identification

1. IT System Names: Grants Management System, Automated Panel Bank System, NEA Website, and Delphi Financial Management System
2. IT System Sponsor: Office of Information and Technology Management
3. System Sponsor Unit: Office of Information and Technology Management
4. (GMS) Manager: Nicki Jacobs  
(APBS) Manager: Kathy Plowitz-Worden  
NEA Website Manager: David Low  
Delphi Manager: Sandy Stueckler
5. PIA Author/date: Sharon Jones, October 19, 2010  
Review Date: November 14, 2013

### 6. Grants Management System (GMS)

The GMS is the Agency's centralized computer database for information about applications and grants. Using the GMS, Agency staff is able to track the status of applications throughout the review process, generate grant award and rejection letters, process grant payments and grant amendments, record the receipt and approval of final reports, and retire grant files. The system also is used to produce a variety of status reports on application processing and customized grant listings (awards sorted by fiscal year, city/state, funding category, discipline, goal, etc.)

**Automated Panel Bank System (APBS)** records information about past and prospective Arts Endowment panelists

**National Endowment for the Arts (NEA) Website** identifies information that is provided by web forms.

**Delphi Financial Management System (FMIS)** is provided by the Department of Transportation's Enterprise Systems Center. It is covered by a DOT privacy Impact Assessment and will not be addressed in this document.

## **II. Privacy Assessment**

### **1. What information is being collected?**

**GMS** The National Endowment for the Arts collects personal information about applicants, and grantees (Name, address, telephone number, date of birth, Social Security number).

**APBS** The National Endowment for the Arts collects personal information about panelists. (Name, address, telephone number, Social Security number, and other data concerning potential and actual panelists, including information about areas of artistic expertise and prior panel service).

**NEA Website** The National Endowment for the Arts collects personal information (Name, address telephone number, and email address) using web forms.

### **2. Why the information is being collected?**

**GMS** information is collected in support of NEA's grant-making programs.

**Automated Panel Bank** information is collected to identify potential panelists with specific expertise for panel meetings.

**NEA Website** information is collected to nominate people and organizations for Lifetime Honors, and to request publications.

### **3. The intended use of the information**

**GMS** information may be used for general administration of the grant review and award process, statistical research, Grants payments, and Congressional oversight and analysis of trends.

**APBS** information is used to select and keep track of individuals who serve on panels.

**NEA Website** information is used to process nomination forms, and send NEA publications.

### **4. With whom the information will be shared.**

**GMS** information is shared mainly in-house but selected data (non-PII) are also shared with Congress, govt-wide sites (e.g., USASpending.gov) and the public.

**APBS** information is shared with NEA staff only.

**NEA Website** information is shared with NEA staff and contractors only.

**5. What notice or opportunities for consent would be provided to individuals regarding what information is collected and how that information is shared.**

**GMS** the following information is presented within the agency privacy policy, at (<http://www.arts.gov/about/Privacy.html>) and also stated below.

**APBS** the following information is presented within the agency privacy policy, at (<http://www.arts.gov/about/Privacy.html>) and also stated below.

**NEA Website** the following information is presented within the agency privacy policy, at (<http://www.arts.gov/about/Privacy.html>) and also stated below.

**III. SECURITY OF INFORMATION.**

The following systems GMS, APBS and NEA website reside on our secured network, protected by the agency firewall and its network authentication process covered in the NEA Access Control Policy.

**IV. REFERENCES.**

**Statutory/Regulatory Authority**

- Privacy Act of 1974 and amendments
- Computer Matching and Privacy Protection Act of 1988 and amendments
- OMB Circular A-130
- E-Government Act of 2002
- OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, September 26, 2003
- OMB Guidance on Inter-Agency Sharing of Personal Data-Protecting Personal Privacy, December 20, 2000

**V. POLICY.**

It is the policy of the National Endowment for the Arts to limit the collection of personal information to that which is needed to conduct official business. When such information is collected, it will be secured and access limited to the greatest extent possible, (<http://www.arts.gov/about/Privacy.html>)

## **VI. INFORMATION COLLECTION.**

NEA collects personal information about applicants, grantees (including cooperative agreement recipients), employees, interns, fellows, panelists, council members, consultants, and contractors. This information is used by Grants and Contracts, Human Resources, Finance, Budget, Research & Analysis, Panel Operations, Council Operations and other offices for agency purposes including application and grant processing, reimbursement, payroll, and personal identification.

In determining whether or not to collect personal information, the responsible individual should consider:

- The relationship of each item of information to be retained to the purpose for which it is collected.
- The impact on the NEA mission if the information is not collected.
- The possibility of meeting the informational need through the use of information not individually identifiable or through other techniques.
- The length of time each item of personal information must be retained.
- The necessity and relevancy of the information to the purpose for which it was collected.

When new elements of information are to be collected, the NEA Systems of Records may need to be amended. If this is determined to be the case, the responsible individual should contact the General Counsel to discuss information requirements.

Website information collection is discussed in Appendix A.

### **Approval Signature**

A handwritten signature in cursive script that reads "Michael R. Burke".

Michael Burke  
Chief Information Officer  
National Endowment for the Arts

## **Appendix A. Privacy Management References**

### **NEA Website**

1. NEA will not use cookies.
2. NEA will not sell personal information to third parties.
3. Website policy shall only apply to the NEA website and not to those to which links are provided.
4. NEA will collect no personal information about visitors to its website unless they choose to provide that information.
5. NEA will collect the following:
  - a. The Internet domain from which a visitor accesses our web site.
  - b. The type of browser and operating system used to access our site.
  - c. The date and time our site is accessed.
  - d. The pages visited and how long each page was visited.
  - e. The website address of a visitor that links to the NEA website from another website.