

National Science Foundation

FastLane Privacy Impact Assessment Version: 2.1 Date: 11/4/2008

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Revisions

Revision Number	Author	Date	Description
Version 2	M Tillotson	July 2008	Updated the PIA template
Version 2.1	W. Marchese P. Rafat	September 2008	Updated FL PIA to reflect SSNBG changes and new or updated requirements.
Version 2.1	Privacy Act Officer	November 3, 2008	L. Jensen, Privacy Act Officer review.

Privacy Impact Assessment Form

1. CONTACT INFORMATION

System Owner:

Maureen B. Miller Acting Chief, External Systems Branch Office of Information and Resource Management Division of Information Systems 703-292-4273

Project Leader:

Beverly B. Jacobs FastLane Project Leader Office of Information and Resource Management Division of Information Systems 703-292-5169

2. GENERAL SYSTEM INFORMATION

- 1. Name of System or Electronic Collection of Information:
 - FastLane (<u>http://www.FastLane.nsf.gov</u>)
- 2. Description of System or Electronic Collection of Information:
 - FastLane is the National Science Foundation's (NSF) web-based grants management system used by over 250,000 scientists, educators, technology experts and administrators, including the country's top researchers.
 - Designed as a web-based interactive real-time system, FastLane is used to conduct NSF business over the Internet. FastLane covers the full range of transactions between a research organization, its researchers, and NSF.
 - The FastLane system operates in an Internal, Public Access, Remote Access, and External Security Domains. These Security Domains define a specific group of users with a set of controlled FastLane objects. Objects include FastLane servers, the FastLane application, the backend database, system routines, support programs, and user class data set access levels (with similar security access enforced by security control policies).
- 3. What is the purpose of the System or Electronic Collection of Information?
 - To prepare and submit NSF proposals for funding, check on the status of proposals, peer-review these proposals, prepare and submit revised budgets and post-award notification, 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.
- 4. Requested Operational Date?
 - The FastLane is a 'Steady State' system in Operations and Maintenance mode that has been in production since 1997.
- 5. Does this collection create a new Privacy Act System or is this information collection covered by an existing Privacy Act System? If so, what is the name of the current Privacy Act System?
 - The FastLane system is covered under the following existing Privacy Act System of Record Notices (SORNs).
 - i. NSF-12, "Fellowships and Other Awards" Federal Register Vol. 63, No. 2, (January 5, 1998)
 - NSF-50, "Principal Investigator/Proposal File and Associated Records," 69 Federal Register 26410 (May 12, 2004)
 - iii. NSF-51, "Reviewer/Proposal File and Associated Records," 69 Federal Register 26410 (May 12, 2004)
 - iv. NSF-54, "Reviewer/Fellowships and Other Awards File and Associated Records," Federal Register Vol. 63, No. 2, (January 5, 1998)
- 6. What specific legal authorities, arrangements, and/or agreements require the collection of this information?
 - <u>NSF 08-1 The Proposal and Award Policies and Procedures Guide</u>
 - o Grant Proposal Guide
 - o <u>Award & Administration Guide</u>
 - National Science Foundation Act of 1950, as amended (42 USC 1861-75)
 - The Privacy Act of 1974, as Amended, 5 U.S.C.§552 a
 - <u>Title 5, Chapter III, Part 1320, Controlling Paperwork Burdens on the Public</u>
 - OMB Control Number 3145-0058
 - OMB Control Number 3145-0023
- 7. Is this an Exhibit 300 system/project?
 - As a NSF Awards major application, FastLane system owners submit an Exhibit 300 annually.

3. DATA IN THE SYSTEM

- 1. What data is to be collected?
 - FastLane processes proposal, payments, Federal Grants Management (non-State), award management and oversight, and reporting information. These information types are documented in the *NSF FastLane Information Categorization and Sensitivity Assessment, dated August 13, 2007.* This includes name, address, e-mail, and SSN (where necessary for business purposes).
- 2. What are the sources of the data?
 - Information is provided directly from authorized external users (i.e., scientists, educators, technology experts, research administrators, graduate students, and panelists) over the public Internet.
- 3. Why is the data being collected?
 - This data allows NSF staff and other authorized personnel to review proposals, award grants, and perform the required administrative functions in support of grants management activities.
- 4. What technologies will be used to collect the data?
 - The FastLane system operates in an Internal, Public Access, Remote Access, and External Security Domains as defined by a specific group of users with a set of controlled FastLane information objects. Objects include FastLane servers, the FastLane application, the backend database, system routines, support programs, and user class data set access levels (with similar security access enforced by security control policies).
- 5. Does a personal identifier retrieve the data?
 - Yes.

4. ATTRIBUTES OF THE DATA (USE AND ACCURACY)

- 1. Describe the uses of the data:
 - FastLane data supports the NSF proposal and award lifecycle and provides information for NSF financial management purposes.
- 2. Does the system analyze data to assist users in identifying previously unknown areas of note, concern or pattern?
 - FastLane does not create new data that would allow determinations to be made, or derive 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. How will the data collected from individuals or derived by the system be checked for accuracy?
 - FastLane users have the capability to review their information online. In addition, they can make corrections and updates online.
 - FastLane is an interactive web-based application that enforces edits and business rules which check for data completeness.
 - FastLane does not derive data.

5. SHARING PRACTICES

- 2. Will the data be shared with any internal or external organizations?
 - Other Federal agencies do not have direct access to or input data to FastLane.
 - NSF staff and support contractors have controlled access to the data necessary to review proposals, authorize grants, and monitor compliance with the Proposal and Award Policies and Procedures Guide http://www.nsf.gov/pubs/policydocs/pappguide/nsf08_1/index.jsp
 - Access to FastLane is limited to authorized internal and external users. These users include the FastLane system administrators, database administrators, and some members of the NSF operational (i.e., Division of Information Systems) support teams.
 - 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 IT Help Central Team Members review the registration application prior to approving access to FastLane
- 3. How is the data transmitted or disclosed to the internal or external organization?
 - 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 and Staff are knowledgeable in proper access protocols; Rules of Behavior, and the use of query tools is tracked by monitoring software.
 - 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
 - Users can retrieve their own data through FastLane only if they are a registered FastLane user. Principal Investigators and Sponsored Research Office officials log into FastLane using their last name, NSF ID, and password.

- 4. How is the shared data secured by external recipients?
 - External recipients are not provided and do not have access to personal information.

6. NOTICE TO INDIVIDUALS TO DECLINE/CONSENT USE

- 1. Was notice provided to the different individuals prior to collection of data?
 - FastLane displays a System Use Notification in accordance with NIST SP 800-53 *Recommended Security Controls for Federal Information Systems* standards.
 - Privacy Act information links are posted for all FastLane access points.
- 2. Do individuals have the opportunity and/or right to decline to provide data?
 - Yes.
- 3. Do individuals have the right to consent to particular uses of the data?
 - Yes.

7. ACCESS TO DATA (ADMINISTRATIVE AND TECHNICAL CONTROLS)

- 1. Is the data secured in accordance with FISMA requirements?
 - Yes, the FastLane major application data is secured in accordance with FISMA requirements. The NSF CIO signed the FastLane accreditation letter on June 30, 2008.
- 2. Describe the privacy training provided to users, either generally or specifically relevant to the program or system?
 - All Intergovernmental Personnel Act (IPA) employees, federal employees, visiting scientists, and contractors must complete annual IT Security Awareness Training. IT Security Awareness Training discusses such topics as recognizing types for sensitive information that must be protected at NSF (e.g., proprietary, Privacy Act, and confidential financial records); the various Federal laws and guidance that relate to the protection of privacy in individuals and business; and an introduction to NSF's privacy policies (e.g., IT Privacy Policy, Policy Regarding the Privacy of Sensitive Information, and Policy on Reporting the Breach of Personally Identifiable Information).
 - NSF staff and contractors that access Privacy Act information are required to sign a Rules of Behavior agreement. These agreements explicitly detail the permissible and appropriate access and actions required when working with NSF resources.

- 3. Will NSF contractors have access to the system? If so, will they be trained on privacy principles?
 - NSF contractors have access to only those FastLane functions required to complete their job responsibilities.
 - NSF contractors are knowledgeable in; proper access protocols, Rules of Behavior; and the use of querying tools is tracked by monitoring software.
 - NSF contractors are required to annually complete Computer Security Awareness training. The training includes segments addressing privacy issues. Promulgated as a mandatory NSF wide policy, individuals that fail to complete this training within the prescribed timeframe automatically have their account and application access restricted to minimal functionality. Upon successful completion of this training appropriate access is restored.
 - NSF contractors that access privacy act information are required to sign a Rules of Behavior agreement. These agreements explicitly detail the permissible and appropriate access and actions required when working with NSF resources.
- 4. Has the retention schedule been established by records management? If so, what is the retention period for the data in the system?
 - Records produced by FastLane are appropriately scheduled with the National Archives and Records Administration's approval.
 - Unfunded proposals are retained for a period of 10 years. At the end of that retention period the proposals are destroyed.
 - Awards are retained for a period of 10 years after the expiration of the grant. After this timeframe records are then transferred to the national Archives and Records Administration.
- 5. What are the procedures for identification and disposition of the data at the end of the retention period?
 - Records produced by FastLane are appropriately scheduled with the National Archives and Records Administration's approval.
 - Unfunded proposals are retained for a period of 10 years. At the end of that retention period the proposals are destroyed.
 - Awards are retained for a period of 10 years after the expiration of the grant. After this timeframe records are then transferred to the national Archives and Records Administration.

8. PRIVACY ANALYSIS

Given the amount and type of data being collected, discuss what privacy risks were identified and how they were mitigated.

• In order to protect personally identifiable information, NSF eliminated the use of Social Security Numbers (SSNs) in business processes and system, including FastLane, wherever possible. As of September 6, 2008 FastLane users are required to use their NSF ID to access FastLane.