

# Institute of Museum and Library Services



Privacy Impact Assessment

for

Library Reviewer Interest Form

Institute of Museum and Library Services Privacy Impact Assessment

Library Reviewer Interest Form

Under the E-Government Act of 2002, the Institute of Museum and Library Services (IMLS) must perform a Privacy Impact Assessment (PIA) (i) before initiating a new electronic collection of information in identifiable form for 10 or more persons (excluding agencies, instrumentalities, or employees of the federal government); or (ii) before developing or procuring information technology systems or projects that collect, maintain, or disseminate information in identifiable form from or about members of the public.

**Section 1. Description of the system/project**

1.1 Please provide a description of the information system or project in plain language. If it would enhance the public's understanding of the system or project, please provide a system diagram.

In your description, please be sure to address the following:

- a. *The purpose that the system/project is designed to serve.*
- b. *Whether it is a general support system, major application, or other type of system/project.*
- c. *System/project location (e.g., within Microsoft Azure, Qualtrics, Drupal, etc.).*
- d. *How information in the system/project is retrieved by the agency employee.*
- e. *Any information sharing.*

The purpose of this collection form is to allow Office of Library Services (OLS) staff to receive information from the public on grant reviewer interest and find those with experience and expertise to match with a set of applications. Information is added to the spreadsheet semi-annually. This is part of the IMLS general support system (GSS) due to its location within Microsoft OneDrive. The spreadsheet is populated with data from the IMLS website CMS. It is accessed only by OLS staff and is not available to the public

**Section 2. Information Collected**

2.1 Indicate below what personally identifiable information (PII) is collected, maintained, and/or disseminated by your system/project (check all that apply).

<b>Identifying numbers (IN)</b>			
a. Social Security number (full or truncated form) *	<input type="checkbox"/>	b. Driver's License	<input type="checkbox"/>
		c. Financial Account	<input type="checkbox"/>
d. Taxpayer ID	<input type="checkbox"/>	e. Passport	<input type="checkbox"/>
		f. Financial Transaction	<input type="checkbox"/>
g. Employer/Employee ID	<input type="checkbox"/>	h. Credit Card	<input type="checkbox"/>
		i. U.S. Citizenship and Immigration Services	<input type="checkbox"/>
j. File/Grant ID	<input type="checkbox"/>		<input type="checkbox"/>
k. Other identifying numbers:			
* Explanation for the need to collect, maintain, or disseminate the Social Security Number:			

<b>General Personal Data (GPD)</b>			
a. Name	<input checked="" type="checkbox"/>	b. Maiden Name	<input type="checkbox"/>
		c. Email Address	<input checked="" type="checkbox"/>
d. Date of Birth	<input type="checkbox"/>	e. Home Address	<input type="checkbox"/>
		f. Age	<input type="checkbox"/>
g. Gender	<input type="checkbox"/>	h. Personal Telephone Number	<input type="checkbox"/>
		i. Education	<input checked="" type="checkbox"/>
j. Marital Status	<input type="checkbox"/>	k. Race/Ethnicity	<input type="checkbox"/>
l. Other general personal data:			

<b>Work-related data</b>			
a. Occupation	<input checked="" type="checkbox"/>	b. Job Title	<input checked="" type="checkbox"/>
		c. Work Email Address	<input checked="" type="checkbox"/>
d. Work Address	<input checked="" type="checkbox"/>	e. Work Telephone Number	<input type="checkbox"/>
		f. Salary	<input type="checkbox"/>
g. Employment History	<input checked="" type="checkbox"/>	h. Procurement/Contracting Records	<input type="checkbox"/>
		i. Employment Performance Rating	<input type="checkbox"/>
j. Other work-related data:			

<b>System Administration/Audit Data</b>			
a. IP Address	<input type="checkbox"/>	b. User ID/Username	<input type="checkbox"/>
		c. Date/Time of Access	<input type="checkbox"/>
d. Queries Run	<input type="checkbox"/>	e. ID of Files Accessed	<input type="checkbox"/>
		f. Personal Identity Verification (PIV) Card	<input type="checkbox"/>
Other system administration/audit data:			

2.2 Indicate the source of the information in the system/project and explain how the information is received.

Source of Information	Explanation
Directly From the Individual About Whom the Information Pertains:	All personal information is provided by the individual who voluntarily enters it via a web form on IMLS.gov.
Government Sources:	
Non-Government Sources:	
Other:	

2.3 Whose data is collected, disseminated, disclosed, used, or maintained by the system/project? Please also provide an estimate of the number of individuals within each category whose PII is contained within the system/project (including the number of minors, if any).

Members of the public	
IMLS employees/contractors	
Other (explain)	

2.4 Provide the legal authority that permits the collection, dissemination, disclosure, use, and/or maintenance of the PII mentioned in Section 2.1 (e.g., Section 9141 of the Museum and Library Services Act (20 U.S.C. § 9141), OMB Circular A-130, etc.).

20 U.S. Code § 9105 (c)–(d) (Museum and Library Services Act of 2018)

2.5 Describe how the accuracy of the information in the system/project is ensured.

OLS relies on the self-reporting of individuals in the library field.

2.6 Is the information covered by the Paperwork Reduction Act?

Yes. (Please include the OMB control number and the agency number for the collection.)	Yes; OMB Control #: 3137-0099, Expiration Date: 6/30/2024
No.	

2.7 What is the records retention schedule approved by National Archives and Records Administration (NARA) for the records contained in this system/project?

This reviewer interest form is not on the OLS file plan. There are no records in the spreadsheet.

2.8 Is the PII within this system/project disposed of according to the records disposition schedule?

This form is not on the OLS file plan. There are no records in the spreadsheet.

**Section 3. Purpose and Use**

3.1 Indicate why the PII in the system/project is being collected, maintained, or disseminated (e.g., for administrative purposes, to improve our services, etc.).

The PII is collected for internal, administrative purposes.

3.2 Indicate whether the system/project collects only the minimum amount required to achieve the purpose stated in response to Question 3.1.

The minimum amount of information is collected to achieve the goals of the form. The information requested is reviewed every three years in conjunction with PRA clearance.

3.3 Indicate how you intend to use the information in order to achieve the purpose stated in Question 3.1 (e.g., to verify existing data, to verify identification, to administer grant aid, etc.).

OLS uses the information collected through the form to search for experiences and expertise of individuals that match sets of grant applications requiring review. The individuals with experiences and expertise that matches a set of grant applications are then considered to serve as grant application reviewers for the agency.

3.4 Does the system/project use or interconnect with any of the following technologies? (Check all that apply.)

Social Media	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Web-based Application (e.g., SharePoint)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Data Aggregation/ Analytics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Artificial Intelligence/ Machine Learning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Persistent Tracking Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cloud Computing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal Identity Verification (PIV) Cards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
None of these	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



**Section 4. Information Security and Safeguards**

4.1 Does this system/project connect, obtain data from, or share PII with any other IMLS systems or projects?

Yes? Explain.	It obtains data from the web form completed through IMLS.gov by those individuals applying to serve as reviewers.
No, this system/project does not connect with, obtain data from, or share PII with any other IMLS system or project.	
<input type="checkbox"/>	

4.2 Does this system/project connect, obtain data from, or share PII with any external (non-IMLS) systems or projects?

Yes? Explain. (Please also describe the PII shared, purpose, and means of sharing the PII, as well as the name of the information sharing agreement.)	
No, this system/project does not connect with, obtain data from, or share PII with any external system or project.	
<input checked="" type="checkbox"/>	

4.3 Describe any de-identification methods used to manage privacy risks, if applicable.

N/A
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4.4 Identify who will have access to the system/project and the PII made available through it.

Members of the public	
IMLS employees/contractors	

Other (explain)	
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4.5 Does the system/project maintain an audit or access log?

Yes? Explain (including what information is compiled in the log).	
No, this system/project does not compile an audit or access log.	<input checked="" type="checkbox"/>

4.6 What administrative, technical, and physical safeguards are in place to protect the PII in the system/project?

<p>The spreadsheet of form entries is stored on the IMLS system, which requires password/PIV card to access.</p>
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4.7 What are the privacy risks associated with the system/project and how are those risks mitigated (e.g., automated privacy controls, privacy training, etc.)? Please include a description of the technology used to protect PII in the system/project.

<p>There are very few risks associated with the Library Reviewer Interest Form. These risks are mitigated through privacy training for employees and controls on who can access the information collected through the form.</p>
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4.8 Under NIST FIPS Publication 199, what is the security categorization of the system/project? Low, Moderate, or High?<sup>1</sup> (Please contact OCIO if you do not know.)

Low	<input checked="" type="checkbox"/>
Moderate	<input type="checkbox"/>
High	<input type="checkbox"/>

4.9 Please describe any monitoring, testing, or evaluation conducted on a regular basis to ensure the security controls continue to work as intended to safeguard the PII within the system/project.

Please refer to the IMLS GSS PIA for information on how the system is monitored, tested, and evaluated.

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<sup>1</sup> Federal Information Processing Standards Publication 199 defines three levels of potential impact on organizations and/or individuals should there be a breach of security. The potential impact is defined as low if, “[t]he loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.” (Emphasis omitted). The potential impact is defined as moderate if, “[t]he loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.” (Emphasis omitted). The potential impact is high if, “[t]he loss of confidentiality, integrity, or availability could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals.” (Emphasis omitted). National Institute of Standards and Technology, *Standards for Security Categorization of Federal Information and Information Systems*, Federal Information Processing Standards Publication 199 at 2-3. (February 2004), <https://nvlpubs.nist.gov/nistpubs/fips/nist.fips.199.pdf>.

**Section 5. Notice and Consent**

5.1 Indicate whether individuals will be notified that their PII is being collected, maintained, or disseminated. (Check the box or expand on the response that applies.)

Yes, notice is provided through a system of records notice (SORN) that was published in the Federal Register and is discussed in the next section.	<input type="checkbox"/>
Yes, notice is provided through a Privacy Act statement, privacy policy, PIA, or privacy notice. The Privacy Act statement, PIA, privacy policy, and/or the privacy notice can be found at (provide text of the notice if a link isn't available):	IMLS's website's privacy policy, available at <a href="https://www.ims.gov/privacyterms">https://www.ims.gov/privacyterms</a> . Also, this PIA will serve as notice on the website.
Yes, notice is provided by other means:	Notice provided through the PRA process.
No, notice is not provided. Please explain why:	

5.2 Please describe whether individuals are given the opportunity to consent to uses of their PII, decline to provide PII, or opt out of the system/project. Specify how below.

Consent	Yes, individuals have the opportunity to consent to uses of their PII:	It is their choice to apply and provide the information.
	No, individuals do not have the opportunity to consent to uses of their PII.	<input type="checkbox"/>
Decline	Yes, individuals have the opportunity to decline to provide their PII:	x
	No, individuals do not have the opportunity to decline to provide their PII.	<input type="checkbox"/>
Opt out of	Yes, individuals have the opportunity to opt out of the system/project:	x
	No, individuals do not have the opportunity to opt out of the system/project.	<input type="checkbox"/>

5.3 Please describe what, if any, procedures exist to allow individuals the opportunity to review or request amendment or correction of the PII maintained about them in the system/project.

Individuals submit their information annually. If an individual would like to change any information in the same year it was submitted, they can call or email the agency with an update.

**Section 6. Privacy Act**

6.1 Is a “system of records” being created under the Privacy Act?

*The Privacy Act of 1974 defines a “system of records” as “a group of any records . . . from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.”<sup>2</sup>*

Yes, a “system of records” is created by this system/project.	<input type="checkbox"/>
No, a “system of records” is not created by this system/project.	<input checked="" type="checkbox"/>

6.2 If you answered ‘Yes’ to the previous question, please include a link to the system of records notice for this system/project. Or please indicate that we will need to create a new systems of records notice for this system/project.

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<sup>2</sup> See Privacy Act of 1974, § 552(a)(5), <https://www.govinfo.gov/content/pkg/USCODE-2018-title5/pdf/USCODE-2018-title5-partI-chap5-subchapII-sec552a.pdf>.

**Section 7. Assessment Analysis (to be completed by OCIO and OGC)**

The Library Reviewer Interest Form collects information that is of low to moderate sensitivity to individuals. The spreadsheet ensures its accuracy by refreshing every year based on information inputted by the individuals themselves. The spreadsheet is only accessed by individuals who have multi-factor authentication and have received privacy training. The system this information is stored within, IMLS GSS, is monitored continuously. IMLS GSS has appropriate controls for access to information and security protocols.