NATIONAL
ENDOWMENT
FOR THE
HUMANITIES

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January 1, 2009

FROM: Brett Bobley, Chief Information Officer
TO: OIRM Staff
SUBJECT: Policy for Conducting Privacy Impact Assessments (PIAs)

As per the E-Government Act of 2002, it is important that OIRM conduct Privacy Impact
Assessments (PIAs) for our major IT systems. These PIAs shall be created and updated
as per the guidance provided by OMB in OMB M03-22, available at:
http://www.whitehouse.gov/omb/memoranda/m03-22.html.

NATIONAL ENDOWMENT FOR THE HUMANITIES

PRIVACY IMPACT ASSESSMENT

Instructions: As per the E-Government Act of 2002, the agency must perform a Privacy Impact Assessment (PIA) before: (a) developing or procuring IT systems or projects that collect, maintain or disseminate information in identifiable form from or about members of the public, or (b) initiating, consistent with the Paperwork Reduction Act, a new electronic collection of information in identifiable form for 10 or more persons (excluding agencies, instrumentalities or employees of the federal government). As per OMB M-03-22, this PIA should be updated when major changes are made to an existing system or when new external disclosure reasons are deemed appropriate.

The key to a successful PIA is to ensure that the public is informed of exactly what we will be doing with their private information. The System Owner will conduct an initial PIA for new systems before it goes in use and review the PIA annually thereafter.

The agency's Senior Agency Official for Privacy (SAOP) and Chief Information Officer (CIO) must approve the PIA before the system can be put into use. Approved PIAs will be posted on the NEH privacy page.

Name of System:	General Support System (GSS)
Date of this PIA:	March 31, 2022
Notes:	As per the NEH PIA policy, PIAs must be reviewed annually, updated when new disclosure reasons are deemed appropriate, and re-assessed when a major system update occurs. NEH is adopting mobile technology in support of telework. This includes the implementation of cloud-based services such as Azure Active Directory, Teams, Acrobat DC, Zoom, and Azure services.
Name and Office of Person(s) Interviewed for PIA:	Charles Hester (System Owner) was interviewed by Tanya Peltz (Director of IRM), on 03/31/2022.
Brief Description:	This system includes the typical business productivity applications like Word, Excel, Outlook, as well as the network/server/printer infrastructure.
Inventory of SORNs updated?	The NEH SORNs have been reviewed and updated as necessary to include all collections of PII hosted in the GSS. The GSS does not have a specific SORN.
Who is the Audience (e.g., what kinds of individuals will be providing us with information about themselves)?	The GSS isn't intended to collect information from any particular audience. However, as a general collection of information in many forms (e-mails, memos, etc.), there is information about the daily business of the NEH. This would include our interaction with grantees, applicants, panelists, agency employees, and other government agencies and private companies with whom we do business.
What information is to be collected (e.g., names, addresses, phone numbers)?	As a general system, the GSS wasn't designed to collect specific information. That said, data stored in this system would certainly include names, addresses, phone numbers, SSNs, and other pieces of PII data.
Why is the information being collected?	The information is collected to facilitate the day-to-day operations of the agency.
What is the intended use of the information?	The information is used in the daily business of processing grants, communicating with other agencies and the private sector.

With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office)?	None of the information in GSS is systematically shared. That said, information generated by staff is certainly shared on an ad-hoc basis (e.g., a press release might be written in the GSS and then posted on the agency website, e-mails are sent to grantees and others, etc.).
Does the system describe to the audience exactly what we will do with the information we collect from them?	GSS is not a public-facing system and does not have a specific audience. There are SORNs for collections of public data which describe what we do with the information.
Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	GSS is not a public-facing system and does not have a specific audience. There are SORNs published for collections of public data which include assurances that collected information will be used appropriately.
What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	N/A- GSS is not a public-facing system and does not have a specific audience. However, there is an NEH Privacy Act Regulations publicly accessible webpage that describes how individuals may exercise rights granted by the Privacy Act.
How will the information be secured (e.g., administrative and technological controls)?	The GSS system is secured according to NIST guidelines and is subject to annual FISMA review. Regarding privacy, the NEH has a privacy policy (M-111, "Safeguarding Personally Identifiable Information") that governs how users should treat PII. This policy is included in yearly security training.
Is a system of records being created under the Privacy Act of 1974, 5 U.S.C. 552a?	No, the GSS is not itself a "system of records" under the Privacy Act, because it is not "a group of . . . 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." 5 U.S.C. 552a(a)(5).
If not, how will you store federal records created by this new system?	Records are being stored and managed according to the agency's approved records schedule.
Comments – Please use this space to provide any additional comments or analysis about this system:	The GSS assessment of NIST 800-53 Rev 4 Security Controls include a suite of Privacy Controls related to Appendix J.
Signature and date of NEH Staff Member who Performed this PIA:	Tanya Peltz <Tanya Peltz> Director of Information Resource Management, 3/31/2022
This PIA is determined by the Senior Agency Official for Privacy (SAOP) to be Approved/Not Approved. Signature and date:	Approved/~~Not Approved~~ Samuel Roth <Samuel Roth> Senior Agency Official for Privacy (SAOP), Office of General Counsel, 4/21/2022
This system is determined by the Chief Information Officer (CIO) to be Approved/Not Approved. Signature and date:	Approved/~~Not Approved~~ Brett Bobley <Brett Bobley> Chief Information Officer (CIO), Office of the Chair, 04/25/2022

OFFICE OF THE **GENERAL COUNSEL**

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A successful PIA informs the public of the nature of the system, the information it collects, the use of that information, and security controls. The Senior Agency Official for Privacy must approve the PIA before the system can be put into use.

1	Name of System:	eGMS
2	Date of this PIA:	October 27, 2017
3	Notes:	Although NEH continues to store within eGMS the same information, and deploy the same safeguards, referenced in its last PIA for eGMS (dated June 16, 2015), NEH has recently expanded functionality within eGMS for grantees and peer review panelists.
4	Name and Office of Person(s) Interviewed for PIA	This PIA updates, and by-and-large incorporates the findings set forth in, an earlier PIA for eGMS, dated June 16, 2015. In connection with that PIA, the Chief Privacy Officer interviewed: 1) Robert Straughter (eGMS Steering Committee, grant representative) 2) Dan Sack (eGMS Steering Committee, program representative) 3) Lisette Voyatzis (OGC) 4) Jesse Johnston (Acting Records Manager) 5) Beth Stewart (Director, Systems Development) This updated PIA also incorporates system characterizations as stated in NEH's System of Records Notice for this system, which NEH published in the Federal Register on

		April 26, 2017, as well as information provided in several interviews with Brett Bobley (Chief Information Office) and Tanya Peltz (Director, Office of Information Resource Management) that took place in August and September of 2017.
5	Brief Description:	Web-based grants processing system.
6	Who is the Audience (e.g. what kinds of individuals will be providing us with information about themselves?)	(1) Individuals who have applied to NEH for financial assistance; (2) in the case of organizations who have applied to NEH for financial assistance, the organization's designated grant administrator and/or project director, as well as other individuals affiliated with the applicant; (3) individuals that have applied to, or received financial assistance, from NEH grantees, including fellows and subgrantees; (4) individuals who have attended NEH-funded seminars; (5) individuals who have applied to or have served as application review panelists; (6) individuals associated with organizations who partner with NEH in grant programs; and (7) individuals serve or have served as members of the National Council on the Humanities.
7	What information is to be collected (e.g., names, addresses, phone numbers)?	Names of individuals, Social Security numbers (only for those grant applicants and panelists receiving payment from NEH), U.S. citizenship status, race and ethnicity (no longer actively collected), email address, telephone and fax number, home and work address, current institutional affiliations, categorical information on disciplines and expertise, and NEH subscriptions. In addition to these records, eGMS contains grant applications, materials associated with NEH-issued awards and written communications between NEH and grantees. Finally, eGMS contains information pertaining to NEH peer review panels, including the identity of panelists, notes and evaluations, and travel reimbursement information.
8	Why is the information being collected?	NEH collects this information so that it may effectively review applications for federal

		financial assistance, including by coordinating the review of application review panelists, and administer awards.
9	What is the intended use of the information?	NEH, panelists and grantees use eGMS to evaluate applications to NEH for federal financial assistance, manage active grants and cooperative agreement awards, and communicate with grantees. NEH's financial management system draws upon contact and other information within eGMS to process the disbursement of grant funds to grantees as well as the payment of honoraria and travel expenses to panelists.
10	With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office?)	(1) With limited exception described below, NEH limits access to eGMS to internal use among program staff, grant management personnel, and accounting technicians. (2) NEH publicly discloses on its website limited information pertaining to funded projects, and often announces successful grant applicants to Congress and via press release. (3) NEH provides extracts from eGMS to other government organizations as required by the DATA Act. (4) NEH application review panelists have limited access to eGMS. They may access eGMS to review grant applications assigned to the panels on which they have been asked to serve, upload evaluations and provide information needed to facilitate payment from the agency for their services. (5) NEH grantees (i.e., those who have received NEH awards) also have limited access to eGMS. Specifically, they may access certain records pertaining to projects of which they are affiliated or pertaining to them individually.
11	Does the system describe to the audience exactly what we will do with the information we collect from them?	(1) Through the relevant grant application guidelines, NEH explains that it is collecting all information sought in the grant application for the principal purpose of processing the grant application and further discloses that it may use the information for

		statistical research, analysis of trends, and Congressional oversight. (2) In addition, when collecting financial information for entry into eGMS, NEH makes clear to individuals providing such information that it is collecting it for the purpose of facilitating payment to the individual's financial institution.
12	Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	Not explicitly, but as described above, NEH makes clear to individuals who provide the information described in the seventh row of this PIA that it has collected the information for the purpose of facilitating payment to the individual's financial institution. In light of the protections of the Privacy Act, and NEH's adherence to it, the individual can reasonably assume that NEH will not use the information for any other purpose.
13	What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	All NEH information collections pertaining to this system are in a sense voluntary as all those providing NEH information maintained in eGMS (grant applicants, peer review panelists, council members) freely apply for financial assistance from the agency or freely seek engagement on an NEH peer review panel.
14	How will the information be secured (e.g., describe any administrative and technological controls? Separation of duties, etc)?	NEH limits access to records within this system to authorized personnel whose official duties require such access. For example, NEH limits the access of its program staff to those functions necessary to processing and evaluation of applications. NEH limits the access of its grant management staff to those functions necessary to managing active grants and disbursing funds. NEH provides limited access to this system to grantees and peer review panelists for the limited purpose of accessing and uploading documents associated with their award and panel service. NEH provides grantees and peer review panelists with individual eGMS accounts to which it restricts access to grants

		and applications for which the individual has an assigned role.
		
		Agency staff accessing eGMS are authenticated via an individually-assigned agency active directory account. Through a one-way trust, NEH maps agency accounts to resources in the eGMS security domain. Once authenticated, NEH restricts access within eGMS using role-based tools and permissions. The eGMS steering committee has defined eGMS-supported roles.
		
		Roles include:
		  • Program staff (access to application intake and other pre-Council functions)
		  • Grants Management staff (access to award processing and other post-Council functions)
		  • Public Affairs staff
		  • Administrator group
		  • Limited access group (read-only)
		  • Grantees (access to grants and other documents associated with projects for which they are affiliated)
		  • Panelists (access to applications and other documents associated with projects to which they have been assigned to review)

15	Has a system of records been created under the Privacy Act, 5 U.S.C. 552a. and published in the Federal Register? If so, what is the SORN number?	Yes: NEH-1. *See* 82 F.R. 19263.
16	Are federal records being created by this system?	Yes.
17	If so, are these records scheduled with NARA and is there a plan to store and process these records?	Yes.
18	Comments. Please use this space to provide any additional comments or analysis about this system.	
	Signature and date of NEH Staff Member who Performed this PIA.	Adam Kress, Senior Agency Official for Privacy, NEH. _AMK_ 10/27/2017

	Signature of NEH Senior Agency Official for Privacy	This system is (circle one): ~~approved~~ **not approved**

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A successful PIA informs the public of the nature of the system, the information it collects, the use of that information, and security controls. The Senior Agency Official for Privacy must approve the PIA before the system can be put into use.

1	Name of System:	Oracle Financial System
2	Date PIA Conducted:	October 27, 2017
3	Name and Office of Person(s) Interviewed for PIA	1) Sean Doss, Director of Accounting, was interviewed by Adam Kress on September 28, 2017. 2) This PIA largely incorporates the findings of the last PIA that NEH performed on its Oracle Financial System, on July 27, 2006. NEH also based that PIA on interviews with its Director of Accounting, as well as its General Counsel and Agency Records Officer. 3) This PIA incorporates system characterizations as stated in NEH's System of Records Notice for this system, which NEH published in the Federal Register on April 26, 2017.
4	Brief Description:	NEH uses the Oracle Financial System for all internal financial accounting. Authorized NEH staff may access the Oracle Financial System electronically via a secure online web portal. Oracle Corporation hosts the system at its Managed Cloud Services' (MCS) facility in Austin, Texas.

5	Who is the Audience (e.g. what kinds of individuals will be providing us with information about themselves?)	Individual grant recipients (e.g., fellows and independent scholars), individuals who have served as application review panelists, NEH employees and contractors, individual vendors and sole proprietors, individuals who donate funds to NEH, and other individuals involved in financial transactions with NEH.
6	What information is to be collected (e.g., names, addresses, phone numbers)?	Names, home and/or work addresses, employee supplier numbers, Social Security numbers, bank name and banking account and routing numbers for electronic fund transfer payments, and information regarding transactions between NEH and the covered individual, including dates, amounts paid, purpose of the transaction, and payee type (e.g., grantee, vendor, application review panelist).
7	Why is the information being collected?	To manage and disburse awards to grant recipients, pay honoraria to and reimburse travel expenses incurred by NEH application review panelists, reimburse travel and other work-related expenses incurred by NEH employees, pay vendors and other contractors who provide goods to or perform services on behalf of the agency, accept cash donations, and generate financial reports.
8	What is the intended use of the information?	To: (i) support and document expenses incurred in the performance of official agency duties, (ii) tender payment to grantees, vendors and contractors; (iii) account for goods and services rendered; (iv) account for funds paid and received; and (v) process travel authorizations and claims.
9	With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office?)	When NEH determines to make payment to an individual, it exports certain information to the Department of the Treasury, which will electronically deposit payment into the recipient's bank account through its Secure Payment System.
10	Does the system describe to the audience exactly what we will do with the information we collect from them?	Yes, NEH makes clear to individuals who provide the information described in the sixth row of this PIA that it has collected the information for the purpose of facilitating payment to the individual's financial institution.

11	Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	Not explicitly, but as described above, NEH makes clear to individuals who provide the information described in the sixth row of this PIA that it has collected the information for the purpose of facilitating payment to the individual's financial institution. In light of the protections of the Privacy Act, and NEH's adherence to it, the individual can reasonably assume that NEH will not use the information for any other purpose.
12	What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	All NEH information collections pertaining to this system are in a sense voluntary, as all those providing NEH information maintained in the Oracle Accounting System (grant applicants, peer review panelists, and employees and contractors) freely enter into these engagements with the agency.
13	How will the information be secured (e.g., administrative and technological controls)?	NEH limits access to records within its financial management system to authorized personnel whose official duties require such access. NEH protects electronic records through user identification, passwords, database permissions, and software controls. The financial management system's underlying software application—Oracle Federal Financials—is compliant with the Federal Risk and Authorization Management Program. In addition, Oracle provides the agency with a detailed SAS-70 that describes its security controls. NEH also utilizes a local role-based security policy for the system.
14	Has a system of records been created under the Privacy Act, 5 U.S.C. 552a.?	Yes: NEH-2. *See* 82 F.R. 19263.
15	If not, how will you store federal records created by this new system?	N/A
16	Are federal records being created by this system?	Yes
17	If so, are these records scheduled with NARA and is there a plan to store and process these records?	Yes

18	Comments. Please use this space to provide any additional comments or analysis about this system.	
	Signature and date of NEH Staff Member who Performed this PIA.	Adam Kress, Senior Agency Official for Privacy _AM_ 10/27/2017
	Signature of NEH Senior Agency Official for Privacy	This system is (circle one): **approved** **not approved** _AM_