

Privacy Impact Assessment

Denali Commission

General Support System



September, 2011

INTRODUCTION:

Congress passed the E-Government Act of 2002 to encourage the use of Web-based Internet applications or other information technology by Government agencies, with the intention of enhancing access to government information and services and increasing the effectiveness, efficiency, and quality of government operations.

To combat public concerns regarding the disclosure of private information, the E-Government Act mandated various measures, including the requirement that Federal agencies conduct a Privacy Impact Assessment (PIA) for projects with information technology systems that collect, maintain, and/or disseminate "personally identifiable information" of the public. Personally identifiable information, or "personal information," is information that may be used to identify a specific person.

Update regarding PIV projects: Federal Information Processing Standards Publication (FIPS PUB) 201 Personal Identity Verification (PIV) of Federal Employees and Contractors and subsequent OMB guidance explicitly require PIAs for PIV projects collecting any personal data, not just of the public.

Primary Privacy Impact Assessment objectives include:

- Ensure and promote the trust and confidence of Denali Commission stakeholders and the general public
- Ensure compliance with the E-Gov Act and other applicable privacy laws, regulations and policies, including the PIV regulations.
- Identify the risks and adverse effects of collecting, maintaining and disseminating personal information in electronic information systems.
- Evaluate and develop protections and alternative processes for handling information to mitigate potential privacy risks.

Additional important objectives include:

- Provide a mechanism for ensuring responsibility and accountability for privacy issues.
- Provide documented assurance that privacy, security and other vital data stewardship considerations are integrated into information technology systems, starting with the initial outlining of a project's objectives and data usage requirements and continuing through design, operation, maintenance and disposal.
- Ensure that decision-makers are provided the information required to make informed system design or procurement decisions, based on an understanding of privacy risk, and of options available for mitigating that risk. Greatly reduce the risk of needing to interrupt a program or service because privacy and other vital data stewardship considerations were not adequately addressed before the program or service was implemented. Promote awareness and understanding of privacy issues.

ASSESSMENT:

A PIA is required for the Denali Commission projects with IT systems that collect, maintain, and/or disseminate personally identifiable information (PII) of the public, not including information of Federal employees and others performing work for Denali Commission. This PIA covers Denali Commission operations and the Denali Commission General Support System (GSS). Denali Commission engages internal and external auditors to conduct auditing measures and has implemented technical safeguards assessed in the Denali Commission GSS System Security Plan to prevent misuse of data. Based on the results of the procedures conducted during this endeavor the following assessments have been made:

- The potential impact of collected data not being available to process for any reason is low as the loss of availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
- The potential impact of data being collected that has been corrupted for any reason is low as the loss of integrity could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
- The potential impact of data being shared with unauthorized individuals after collected is low if as the loss of confidentiality could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.

CONDITIONS:

Denali Commission policy prohibits the agency from collecting and maintaining criminal record information, education information, or any other type of personal information.

SYSTEM OF RECORDS NOTIFICATION

Denali Commission has not communicated with the Federal registry at this time regarding a System of Records Notification (SORN). The vendor information maintained on the system is retrieved using the vendor's name or a locally assigned vendor identification number. Vendor information is not retrieved using TINs. The vendor information can be retrieved using the TIN but rarely is due to the difficulty of accessing the data with an un-indexed data field.

SECURITY

The Denali Commission GSS follows IT security requirements and procedures required by federal law and policy to ensure that information is appropriately secured. A risk assessment to identify appropriate security controls to protect against risk, and implementation of those controls identified has been executed. These documents can be made available upon request to Denali Commission Management. Furthermore, security monitoring, testing, and evaluating are conducted on a regular basis to ensure that controls continue to work properly, safeguarding the information.

CHANGE RECORD

This is the second PIA to be conducted at Denali Commission.

CHILDREN'S ONLINE PRIVACY PROTECTION ACT

Denali Commission will not collect information through the Internet from children under age 13 for any reason at anytime.

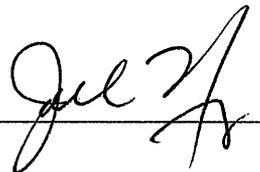
PUBLIC AVAILABILITY

According to the Electronic Government Act of 2002, Denali Commission will make this PIA available to the public. This section provides documented assurance the PIA has been reviewed for any potentially sensitive information that should be removed from the version of the PIA that is made available to the public.

ACCEPTANCE OF RESPONSIBILITY AND ACKNOWLEDGEMENT OF ACCOUNTABILITY

I have carefully reviewed the text of this PIA. I am responsible for funding and procuring, developing, and integrating privacy and security controls into the Denali Commission GSS. I understand that integrating privacy and security considerations into the GSS may affect the development time and cost of operations and must be planned for accordingly. I will ensure that privacy and information security policies, guidelines, and procedures are followed in the development, integration, and, if applicable, the operation and maintenance of the Denali Commission GSS.

Denali Commission Federal Co-Chair



Date

9-21-11