

INTER-AMERICAN FOUNDATION Privacy Impact Assessment

Instructions: Section A, B, C, and D must be completed for all systems.
Section E must be completed if yes is the answer to Section B, questions 1 and 2.

Date: September 19, 2005

A. GENERAL SYSTEM/APPLICATION INFORMATION

1. Person completing this form:

Name	Title	Phone No.	Office
Pam Palma	Information Systems Security Officer (ISSO)	703-306-4342	IMS

2. System owner:

Name	Title	Phone No.	Office
Ramón Daubón	Vice President for Program	703-306-4325	Program

3. What is the name of this system?

Grant Evaluation and Management System (GEMS).

4. Briefly describe the purpose of this system. What agency function does it support?

The Grant Evaluation and Management System (GEMS) is a relational database and application developed in Oracle to automate the Foundation's grant-making processes, including the electronic review and approval of grant proposals, generation of grant agreement documents and correspondence, and tracking the status of projects during the grant life cycle. GEMS is a mission supportive application that processes Sensitive but Unclassified (SBU) information intended for release to various governmental, public and private entities. Disclosure of GEMS information should not have a serious adverse impact on IAF or individuals and/or organizations seeking federal funding for various projects. GEMS does not interface or exchange data with any other internal or external system or application, and there is currently no public access to GEMS data.

5. Note below whether this Privacy Impact Assessment supports a proposed new system or a proposed modification to an existing system.

New System Modify Existing System SPAO Request

B. PRIVACY ACT APPLICABILITY

1. Does this system collect, maintain, or disseminate personal information in identifiable form (e.g., name, social security number, date of birth, home address, etc.) about individuals?

Yes ___ No X

2. If yes, will the data be retrieved by an individual's name or other personal identifier (e.g., social security number, badge number, etc.)?

Yes ___ No X

C. INFORMATION COLLECTION APPLICABILITY

1. Will the personal data be collected from or maintained by persons who are not Federal employees?

Yes ___ No X

2. Will the data be collected from Federal contractors?

Yes ___ No X

3. If the answer is yes to either question 1 or 2, will the data be collected from 10 or more persons during a calendar year? N/A

Yes ___ No ___

4. If the answer is yes to question 3, is the information to be collected covered by an existing OMB clearance number? If yes, indicate the clearance number, N/A

D. RECORDS RETENTION AND DISPOSAL SCHEDULE APPLICABILITY

Does this system already have a NARA-approved records disposition schedule?

Yes ___ No X

If yes, list the records schedule number _____

Complete Section E only if the answers to Section B, questions 1 and 2 are Yes.

E. SYSTEM DATA INFORMATION (N/A)

1. *Type* of information maintained in the system
 - a. Describe the information to be maintained in the system (e.g., financial, medical, training, personnel.) Give a detailed description of the data.

2. *Source* of the data in this system
 - a. Is data being collected from the subject individual? If yes, what types of data are being collected?
 - b. Is data on this individual being collected from other IAF files and databases for this system? If yes, identify the files and databases.
 - c. Is data on this individual being collected from a source or sources other than the subject individual and IAF records? If yes, what is the source and what type of data is being collected?
 - d. How will data collected from sources other than the subject individual or IAF records be verified as current, accurate, and complete?

3. *Attributes* of the data
 - a. Are the *data elements* described in detail and documented? If yes, what is the name of the document? Where is it located? **Please attach a copy to this form.**
 - b. Is the use of the data both relevant and necessary for the purpose for which the system is designed?
 - c. Will the system derive (i.e., create) new data or create previously unavailable data about an individual through aggregation from the information collected?
 - (1) How will aggregated data be maintained, filed, and utilized?
 - (2) How will aggregated data be validated for relevance and accuracy?

4. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

5. How will the data be *retrieved* from the system?
 - a. Can it be retrieved by personal identifier? ___ Yes ___ No.
If yes, explain.

- b. Is a password or data description required? ___ Yes ___ No.
6. Describe the report or reports that can be produced from this system.
- a. What reports are produced from the system?
- b. What are the reports used for?
- c. Who has access to these reports?
7. *Records retention*
- a. What are the record types contained in this system and the medium on which they reside? (Examples: type - program records, medium - electronic; type - database, medium - electronic; type - system documentation, medium - paper.)
- b. What is the NARA-authorized retention period for each records series in this system?
- c. If unscheduled, what are your retention requirements for each records series in this system?
- d. What are the procedures for disposing of the data at the end of the retention period (specifically address paper copy, magnetic, or other forms of media)?
- e. How long will produced reports be maintained?
- f. Where are the reports stored?
- g. Where are the procedures for maintaining the data/reports documented?
- h. How will unused or unwanted reports be disposed of?
8. *Capability to monitor individuals*
- a. Will this system provide the capability to identify, locate, and monitor (e.g., track, surveillance) individuals? ___ Yes ___ No. If yes, explain.
- b. What controls will be used to prevent unauthorized monitoring?
9. *Coverage Under Existing Privacy Act System of Records*
- a. Under which Privacy Act System of Records (SOR) notice does this system operate (link to list of SOR available on IAF website. Provide number and name.
- b. If the Privacy Act System of Records is being modified, will the SOR notice require amendment or revision? ___ Yes ___ No.
If yes, explain.10.

10. *Access to the Data*

- a. Who will have access to the data in the system (users, managers, system administrators, developers, other)?
- b. Are criteria, procedures, controls, and responsibilities regarding access documented? If so, where?
- c. Will users have access to all data in the system or will users' access be restricted? Explain.
- d. What controls are or will be in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?
- e. Do other systems share data or have access to data in this system?
 Yes No. If yes, explain.
- f. Will other agencies share data or have access to data in this system (Federal, State, local, other)? Yes No. If yes, explain how the data will be used by the other agency.
- g. Were Privacy Act clauses cited (or will be cited) and were other regulatory measures addressed in contracts with contractors having access to this system?
 Yes No. If yes, explain.

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL
(to be completed by FOIA/PA Officer)

System Name: Grant Evaluation and Management System (GEMS)

Submitting Office: Office of Management Information & Services

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable. Currently covered under IAF System of Records. No modification to the system notice is required.

Privacy Act is applicable. Creates a new system of records. FOIA/PA Team will take the lead to prepare the system notice.

Privacy Act is applicable. Currently covered under IAF System of Records. Modification to the system notice is required. FOIA/PA Team will take the lead to prepare the following changes:

Comments:

Reviewer's Name	Title	Date
Jocelyn Nieva	FOIA/PA Officer	9/26/05

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance.

Comments:

Reviewer's Name	Title	Date
Jocelyn Nieva	FOIA/PA Officer	9/26/05

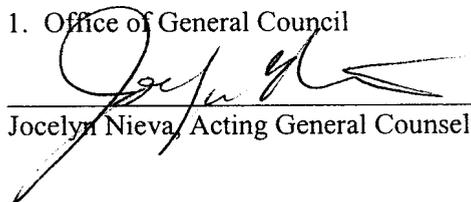
C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

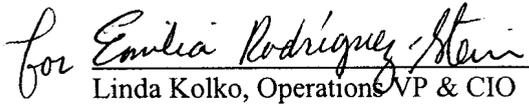
- Additional information is needed to complete assessment.
- Needs to be scheduled.
- Existing records retention and disposition schedule covers the system - no modifications needed.
- Records retention and disposition schedule must be modified to reflect the following:

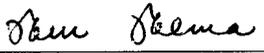
Comments:

Reviewer's Name	Title	Date
Pam Palma	Records Officer	9-26-05

D. APPROVAL OF PRIVACY IMPACT ASSESSMENT BY OTHER OFFICIALS

1. Office of General Council
 (Signature) 9/26/05 (Date)
 Jocelyn Nieva, Acting General Counsel

2. Chief Information Officer/Senior Agency Official for Privacy
 For  (Signature) 9/26/05 (Date)
 Linda Kolko, Operations VP & CIO

3. IT Security Specialist
 (Signature) 9/26/05 (Date)
 Pam Palma, Information Systems Security Officer