# APPENDIX F

## Privacy Impact Assessment (PIA)
## Information Collection Checklist

Instructions: Please respond to each question buy entereing an "X" in the appropriate column.
For questions 1-7, "how many" may be estimated. Return completed forms to the Privacy Officer.

| Who Are You Collecting From? | YES/NO | How Many? |
|---|---|---|
| Are You Requesting Information From: | **NO** | |
| 1. ADF Direct Hire Staff? | **NO** | |
| 2. ADF Contractors (includes IC's and PSC's)? | **NO** | |
| 3. Other Federal Agencies? | **NO** | |
| 4. State, Local or Tribal Governments? | **YES** | |
| 5. Small Businesses, Educational or Non-profit Institutions? | **NO** | |
| 6. Public (US citizens or Legal Permanent Residents)? | **NO** | |
| 7. Non-US Citizens? | **NO** | **~ 200** |

| What Are You Collecting | YES/NO |
|---|---|
| 8. Will the system contain any of the following which are personally identifiable information? | |
| 8. (a) Name | **YES** |
| 8. (b) Social Security Number | **NO** |
| 8. (c) Date of Birth | **NO** |
| 8. (d) Place of Birth | **NO** |
| 8. (e) Mother's Maiden Name | **NO** |
| 8. (f) Biometric Records (fingerprint, photograph, voice print, etc.) | **NO** |
| 8. (g) Educational Records (transcripts, conduct reports, etc.) | **NO** |
| 8. (h) Financial Records | **YES** |
| 8. (i) Medical History | **NO** |
| 8. (j) Criminal History | **NO** |
| 8. (k) Employment History | **NO** |

| How Are You Collecting It? | YES/NO |
|---|---|
| 9. Will the collection be manual or paber-based? | **YES** |
| 10. Will the collection be electronic (server, e-mail, web-based, etc.)? | **YES** |
| 11. Are records to be retrieved with database elements in ietms 8 (a-k)? | **YES** |

| | |
|---|---|
| 12. **What is the purpose of the collection of this information?**<br>Ans.: To disseminate information throughout the Foundation and its overseas offices on the status of grants. | |

| | |
|---|---|
| 13. **How is this information going to be used after it is collected?**<br>Ans.: Used to manage grant operations. | |

| | |
|---|---|
| 14. **Who will have access to the information?**<br>Ans.: All headquarters staff, Partners, Representatives, and grantees. | |

## I. Contact Information System Name:

| 1. Who is the individual completing this form? | Enter Response in this Column |
|---|---|
| Name | Jeannette Whitfield |
| Role/Title | Grant Database Manager |
| Organization | African Development Foundation |
| Telephone Number | 202-673-3916 ext. 124 |
| E-mail Address | jwhitfield@usadf.gov |

| 2. Who is the System Owner? | |
|---|---|
| Name | Jeannette Whitfield |
| Role/Title | Grant Database Manager |
| Organization | African Development Foundation |
| Telephone Number | 202-673-3916 ext. 124 |
| E-mail Address | jwhitfield@usadf.gov |

| 3. Who is the System Manager for this system or application? | |
|---|---|
| Name | Jeannette Whitfield |
| Role/Title | Grant Database Manager |
| Organization | African Development Foundation |
| Telephone Number | 202-673-3916 ext. 124 |
| E-mail Address | jwhitfield@usadf.gov |

| 4. Who is the Information Systems Security Officer (ISSO) who reviewed this document? | |
|---|---|
| Name | Larry P. Bevan |
| Role/Title | Chief Information Officer |
| Organization | US African Development Foundation |
| Telephone Number | 202-673-3916 ext. 113 |
| E-mail Address | lpbevan@usadf.gov |

| 5. Who is the Privacy Office individual reviewing this assessment? | |
|---|---|
| Name | Larry P. Bevan |
| Role/Title | Chief Information Officer & Chief Privacy Officer (Acting) |
| Organization | US African Development Foundation |
| Telephone Number | 202-673-3916 ext. 113 |
| E-mail Address | lpbevan@usadf.gov |

| 6. Who is the Senior Agency Official reviewing this assessment? | |
|---|---|
| Name | Larry P. Bevan |
| Role/Title | Chief Information Officer & Chief Privacy Officer (Acting) |
| Organization | US African Development Foundation |
| Telephone Number | 202-673-3916 ext. 113 |
| E-mail Address | lpbevan@usadf.gov |

## II. System Information

| System Information | Enter Response in this Column |
|---|---|
| **1. System Description**: Include a description of the hardware & software platform on which the system resides, whether it resides on the USADF network or elsewhere (e.g., only at a Mission, Dept. of State, hosted by 3rd party, etc.) | **Dell Power Edge Server running MS SQL 2008 Server (Operating System)**<br>**Residing on the ADF Network** |
| **2. System Number:** Provide uniquely identifying system number and number of associated funding vehicle/program, if different. [If OMB Exhibit 300 is filed for this system, provide that identification number] | **ADF-002** |
| **3. Purpose of the System:** | |
| a. What is the objective of this system? (e.g. to track direct hire benefits, to process financial transactions for bureau/office/program, to provide project-specific reports, etc.)<br><br>b. Provide a description of the information in the system, functions the system performs, and how it supports USADF's mission.<br><br>c. Describe generally the modules and subsystems and their functions. | **Objective is to provide detailed status of grant financial and programmatic activity. Information can be queried and reports can be generated in various ways.**<br>**Basic, detailed information for each grant awarded, including budgets, location, time frame, banking, disbursements, expenditures.**<br><br>**As Above** |
| **4. What legal authority authorizes the purchase or development of this system/application?**<br><br>List the statutory provisions or Executive Orders that authorize the maintenance of the information to meet an official program mission or goal. | **MS 466** |
| **5. Phase of System Development Life Cycle (SDLC): (Select only ONE phase)** | ☐ Initiation<br>☐ Development/Acquisition<br>☑ Impementation<br>☑ Operations/Maintenance<br>☐ Disposal |
| **6. Has the system been designated as a:**<br><br>**a. Major Application**<br>**b. Minor Application**<br>**c. General Support System** | ☑ Yes (Check Appropriate designation)<br><br>☑<br>☐<br>☑<br>☐ No |

## II. System Information

| System Information | |
|---|---|
| **7. Location of System:**<br>Enter where the system is or will be physically located. If the system is managed by an external entity or contractor, please also provide the name of the organization and/or contractor.<br><br>Organization/Contractor<br>(if applicable) | **System is located in a secure, separately air-conditioned room at ADF headquarters.** |
| Name of the site | **US African Development Foundation** |
| Building name & room | **Wide Area Network (WAN) Room, #1019** |
| City | **Washington** |
| State | **District of Columbia** |
| ZIP | **20005** |
| **8. System Security Categorization:**<br><br>Has or will a System Security Categorization be conducted for this system?<br><br>a. if yes, what is the final categorization?<br><br>b. does the system process sensitive but unclassified data? | ☑ Yes ☐ No<br><br>☑ Low ☐ Moderate ☐ High<br><br>☐ No |
| **9. Has or will this system be granted an approval to operate as the result of a security Certification and Accreditation?** | ☑ Yes ATO Date **9/2008**; Interim ATO Date_____<br><br>☐ No |
| **10. Personally Identifiable Information (PII) about U.S. Citizens and/or Legal Resident Aliens:**<br><br>Does/Will the system collect, maintain, or share information that can be used to directly or indirectly identify an individual?<br><br>(Data contained in any of the system's records, databases, files or documents.) | ☐ Yes (If yes, please indicate where backups are located.)<br>☑ No<br><br>☐ Yes (You must complete a PIA Worksheet)<br><br>☑ No (Privacy Impact Assessment is complete) |
| PII includes information about an individual that may include but is not limited to:<br><br>Name, address, Social Security Number or other identifying number assigned to the person, telephone number, email address, biometric records (photo, fingerprint, DNA), medical history, criminal or background investigation records. | |

## III. Collecting and Sharing Personally Identifiable Information (PII)

| Question - Guidance | Enter Response in this Column |
|---|---|
| **1. Does/Will the System contain (store) PII within any database(s), record(s), file(s) or Web site(s) hoted by this system?**<br><br>Note: If yes, check all that apply. If the category of personal information is not listed, please check "Other" and identify the category.<br><br>**Please note: This question seeks to identify all personal information contained within the system. This includes any PII, whether or not it is subject to the Privacy Act; whether the individuals are employees, the public research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicabilty to the requirements under The Privacy Act or other legislation.** | ☑ Yes<br>☐ No<br><br>☑ Name<br>☐ Date of birth, race, gender<br>☐ Social Security Number (or another number originated by a government that specifically identifies and individual)<br>☐ Photographic Identifiers (photographic image, x-rays, video)<br>☐ Driver's License<br>☐ Biometric Identifiers (fingerprint, voiceprint, retinal scan, or DNA)<br>☐ Mother's Maiden Name<br>☑ Mailing Address<br>☑ Phone Numbers (telephone, facsimile, or cellular)<br>☐ Medical Information<br>☑ Financial Account Information and/or Numbers (checking or saving account numbers and/or PINs)<br>☐ Legal Documents, Records or Notes (divorce decrees, criminal records)<br>☑ E-mail Address<br>☐ Military /Employment Records<br>☐ Foreign Activities and/or Interests<br>☐ Other _____ |
| **2. Indicate all the categories of individuals about whom PII is or will be stored.** | ☐ Employees<br>☐ Public citizens<br>☐ Patients<br>☑ Vendors/Suppliers/Contractors<br>☐ Business Partners/contacts (federal, state, local agencies)<br>☑ Other _____<br><br>**Grantees** |

## III. Collecting and Sharing Personally Identifiable Information (PII)

| Question - Guidance | Enter Response in this Column |
|---|---|
| **3. Are records on the system (or will records on the system be) retrieved by one or more data elements?**<br><br>Note: If yes, check all that apply. If the category of personal information is not listed, please check "Other" and identify the category.<br><br>**Please note: This question seeks to identify all personal information contained within the system. This includes any PII, whether or not it is subject to the Privacy Act; whether the individuals are employees, the public research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicabilty to the requirements under The Privacy Act or other legislation.** | ☑ Yes<br>☐ No<br><br>☑ Name<br>☐ Date of birth, race, gender<br>☐ Social Security Number (or another number originated by a government that specifically identifies and individual)<br>☐ Photographic Identifiers (photographic image, x-rays, video)<br>☐ Driver's License<br>☐ Biometric Identifiers (fingerprint, voiceprint, retinal scan, or DNA)<br>☐ Mother's Maiden Name<br>☑ Mailing Address<br>☑ Phone Numbers (telephone, facsimile, or cellular)<br>☐ Medical Information<br>☑ Financial Account Information and/or Numbers (checking or saving account numbers and/or PINs)<br>☐ Legal Documents, Records or Notes (divorce decrees, criminal records)<br>☑ E-mail Address<br>☐ Military /Employment Records<br>☐ Foreign Activities and/or Interests<br>☐ Other_____ |
| **4. Are/Will records on 10 or more individuals containing PII (be) maintained, stored, transmmitted/passed through the system?** | ☐ Yes<br>☑ No |

## III. Collecting and Sharing Personally Identifiable Information (PII)

| Question - Guidance | Enter Response in this Column |
|---|---|
| **5. Is the system (or will it be) subject to the Privacy Act?** | ☑ Yes<br>☐ No |
| **6. Has a Privacy Act System of Record (SOR) Notice been published in the Federal Register for this system?** | ☐ Yes, provide the SORN #:_____;and the Federal Register Publication information:_____<br>☑ No, explain why a SORN was not published<br>☐ No PII is contained in the system<br>☐ PII is in the system, but records are not retrieved by PII<br>☐ Should have published an SOR, but was unaware of the requirements.<br>☐ System is required to have an SOR, but is not yet procured or operational<br>☐ Other_____ |
| **7. If a SOR Notice has been published, have major changes to the system occurred since publication?** | ☐ Yes<br>☑ No<br>☐ N/A |
| **8. Is the PII in the system voluntarily submitted (or will it be)?** | ☑ Yes<br>☐ No, PII is extracted from AID 500-1 |
| **9. Does or will the system collect PII directly from individuals?** | ☑ Yes<br>☐ No |
| Note: If yes, check all that apply. If the category of personal information is not listed, please check "Other" and identify the category. | ☑ Name<br>☐ Date of birth, race, gender<br>☐ Social Security Number (or another number originated by a government that specifically identifies and individual)<br>☐ Photographic Identifiers (photographic image, x-rays, video)<br>☐ Driver's License<br>☐ Biometric Identifiers (fingerprint, voiceprint, retinal scan, or DNA)<br>☐ Mother's Maiden Name<br>☑ Mailing Address |

## III. Collecting and Sharing Personally Identifiable Information (PII)

| Question - Guidance | Enter Response in this Column |
|---|---|
| **Please note: This question seeks to identify all personal information contained within the system. This includes any PII, whether or not it is subject to the Privacy Act; whether the individuals are employees, the public research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicabilty to the requirements under The Privacy Act or other legislation.** | ☑ Phone Numbers (telephone, facsimile, or cellular)<br>☐ Medical Information<br>☑ Financial Account Information and/or Numbers (checking or saving account numbers and/or PINs)<br>☐ Legal Documents, Records or Notes (divorce decrees, criminal records)<br>☑ E-mail Address<br>☐ Military /Employment Records<br>☑ Foreign Activities and/or Interests<br>☐ Other_____ |
| **10. Does or will the system collect PII from other resources (i.e. databases, web sites, etc.)?**<br><br>Agencies are responsible for ensuring processes are in place to verify and validate personally identifiable information as directed by the Privacy Act of 1974. | ☐ Yes<br>☑ No<br>No data is being collected from the public |
| **11. Does or will the system populate data for other resources (i.e. do databases, web sites, or other resources rely on this system's data)?**<br><br>Before sharing any records about an individual to any person other than an Agency, unless the dissemination is made under FOIA, the agency must make reasonable efforts to assure that such records are accurate, complete, timely, and relevant for Agency purposes on each system.<br><br>Agencies must ensure processes are in place to verify and validate personally identifiable information. | ☐ Yes, PII is disseminated to US State Department<br>☑ No<br>No data is being collected from the public. Information shared is populated by employment |
| **12. If the PII in the system is or will be matched against PII in one or more other computer systems internal or external to USADF, are (or will there be) computer data matching agreement(s) in place?** | ☐ Yes (If yes, indicated internal or external and the system (s) with data which are matched).<br>Location of other systems involved in matching:<br>☐ Internal to USADF<br>☐ External to USADF<br>Other systems involved:<br>_____<br>☑ No<br>**USADF** |

## III. Collecting and Sharing Personally Identifiable Information (PII)

| Question - Guidance | Enter Response in this Column |
|---|---|
| **13. If data matching activities will occur, will the PII be de-identified, aggregated, or otherwise made anonymous?** | ☐ Yes (If yes please describe)<br>☐ De-identified<br>☐ Aggregated<br>☐ Other<br>☐ No<br>**N/A** |
| **14. How is shared information secured in transit?** | Not Applicable |
| **14a. Is a Memorandum of Understanding (MOU) or agreement in place with external organizations receiving PII from this system?** | ☐ Yes<br>☐ No<br>☑ N/A |
| **14b. Does the MOU or agreement stipulate how the external organization will protect the PII it receives?** | ☐ Yes<br>☐ No (If no, explain how these security issues will be addressed<br>☑ N/A |
| **14c. Does the MOU or agreement stipulate how the external organization will protect the PII it receives?** | ☐ Yes<br>☐ No (If no, explain how these security issues will be addressed to protect the PII shared)<br>☑ N/A |
| **15. Has this system filed an Information Collection Request (ICR) Form (83-I) with OMB?** | ☐ Yes, provide date of filing. _____<br>☐ No, describe justification for not filing an ICR:_____<br>**N/A** |
| **16. If an ICR from was submitted, what is the control number OMB issued for the system?** | ☐ An ICR is not required for this system.<br>☐ ICR Control Number issued<br>☐ Control # still pending<br>**N/A** |

## IV. RETENTION, NOTICE AND REDRESS

| Question - Guidance | Enter Response in this Column |
|---|---|
| **1. What is the retention period for the data in the system?**<br><br>Time data is kept live on system, time data is kept in off site archive, and when data is destroyed, if applicable. | **Data is stored indefinitely.** |
| **2. How are individuals notified of collection of PII prior to the collection?**<br><br>Such as individual notice (attach copy), posted Privacy Act notice on form, System of Records Notice in Federal Register. | **Information is collected on paper forms and transferred to the database.** |
| **3. Do individuals have the opportunity and/or right to decline providing information?** | ☑ Yes<br>☐ No<br>☐ N/A |
| **4. Are individuals advised of the penalties or consequences of not providing requested information?** | ☑ Yes<br>☐ No<br>☐ N/A |
| **5. Do individuals have the right to consent to particular uses of the information?** | ☑ Yes (If yes, how does the individual exercise this right?)<br>☐ No<br>☐ N/A |
| **6. Are there procedures that permit individuals to gain access to their own information?** | ☐ Yes, describe the procedures:_____<br>☐ No<br>☑ N/A |
| **7. Is this system exempt from the amendment/correction provision of the Privacy Act?** | ☐ Yes, cite the basis for the exemption or the source where the explanation may be found<br>☐ No<br>☑ N/A |

## V. Web Site Hosting

| Question - Guidance | Enter Response in this Column |
|---|---|
| **1. Does/Will the system host a Web site?** | ☐ Yes (If yes, identify all the users with access to PII on he system and for what purpose they use PII).<br>Type of site:<br>☐ Public Internet<br>☐ Internal USADF<br>☐ Both<br>☑ No |
| **2. Is the web site accessible by the public or other entities (i.e. contractors, third party administrators, state, or local agencies, etc.)?** | ☐ Yes, OMB M-99-18 is invoked, requiring that Agencies must post privacy policies on their principal web sites, any known major entry points, and any web page where substantial personal information is collected from the public.<br>☐ No<br>☑ N/A |
| **3. Is a privacy policy statement posted on the web site?**<br>The privacy policy must state what information is being collected, the authority under which the information is sought, the principal purpose(s) for the information collection, the routine use(s) to which the information may be put, and the effect(s) of not providing all or any part of the information sought. Privacy policies must be clearly labeled and easily accessed when an individual visits a web site. | ☐ Yes<br>☐ No<br>☑ N/a |
| **4. Are web links posted anywhere on the website?** | ☐ Yes<br>☐ No<br>☑ N/A |
| **5. Are cookies present on the web site?**<br>Session cookies are allowed as long as the use of session cookies are indicated in the privacy policy statement and the agency is able to demonstrate a valid need for the use of session cookies.<br>Cookies must not be knowingly transferred to third parties unless explained in the Privacy and Security Statement. | ☐ Yes, identify the types of cookies.<br>☐ Persistent Cookies†<br>☐ Session cookies only<br>☐ No **N/A**<br>†Persistent cookies are prohibited. |

## V. Web Site Hosting

| Question - Guidance | Enter Response in this Column |
|---|---|
| **6. Does/Will the web site have any information or pages directed at children?** If Yes, the Children's Online Privacy Protection Act (COPPA) and OMB M-00-13 are all invoked. | ☐ Yes<br>☐ No<br>**N/A** |
| **7. Does the web site collect PII from individuals?** | ☐ Yes, identify what PII the system collects from the list below.<br>☐ No<br>**N/A** |
| Note: If yes, check all that apply. If the category of personal information is not listed, please check "Other" and identify the category. | ☐ Name<br>☐ Date of birth, race, gender<br>☐ Social Security Number (or another number originated by a government that specifically identifies and individual)<br>☐ Photographic Identifiers (photographic image, x-rays, video)<br>☐ Driver's License<br>☐ Biometric Identifiers (fingerprint, voiceprint, retinal scan, or DNA)<br>☐ Mother's Maiden Name<br>☐ Mailing Address |
| **Please note: This question seeks to identify all personal information contained within the system. This includes any PII, whether or not it is subject to the Privacy Act; whether the individuals are employees, the public research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicabilty to the requirements under The Privacy Act or other legislation.** | ☐ Phone Numbers (telephone, facsimile, or cellular)<br>☐ Medical Information<br>☐ Financial Account Information and/or Numbers (checking or saving account numbers and/or PINs)<br>☐ Legal Documents, Records or Notes (divorce decrees, criminal records)<br>☐ E-mail Address<br>☐ Military /Employment Records<br>☐ Foreign Activities and/or Interests<br>☐ Other_____ |
| **8. Does the web site share PII with:**<br><br>**a) internal parties other than those employees of the Agency who maintain the record and who have a need for the record in the performance of their duties,** | ☐ Yes<br>With whom?_____<br>For what purpose?_____<br>☐ No<br>☑ N/A |

## V. Web Site Hosting

| Question - Guidance | Enter Response in this Column |
|---|---|
| **or** | |
| **b) external parties of the Agency?** | ☐ Yes<br>With whom?_____<br>For what purpose?_____<br>☐ No<br>☑ N/A |
| **9. Are rules of conduct in place for access to PII on the web site?** | ☐ Yes, identify all categories of users with access to PII on the system, and for what purposes the PII is used.<br>☐ No<br>☑ N/A |

## VI. Administrative Controls

| Question - Guidance | Enter Response in this Column |
|---|---|
| **1. Has a risk assessment been conducted for this system in which the presence of PII is specifically addressed?**<br><br>USADF must engage in a risk assessment process that ensures risk to Agency individuals, systems, and information is managed at an acceptable level. | ☑ Yes<br>☐ No<br>No PII therefore no risk assessment to consider, however risk assessment has been done |
| **2. If the system completed security accreditation, have there been major changes to the system since its last accreditation?**<br>USADF must engage in an assessment process that ensures existing technical security features are appropriate to the modified system. | **9/2008**<br>☑ Yes, enter date of system accreditation:_____.<br>(If Yes, the modified system is required to undergo an update of the certification and accreditation process.)<br>☐ No |
| **3. Have the minimum baseline security controls, as defined by NIST 800-53, been implemented on the system or the General Support System on which it operates?** | ☑ Yes<br>☐ No |
| **4. When were system security controls last reviewed?**<br><br>Security controls must be reviewed routinely to ensure sustained effectiveness even when no changes to the system have occurred.<br><br>OMB Circular A-130 stipulates that a system's security controls should be reviewed when significant modifications are made to a system, but at least every three years. The scope and frequency of the review should be commensurate with the acceptable level of risk for the system. | Enter date of last security control review: _____9/2008_____ |
| **5. Is there a system security plan for the system?** The Privacy Act of 1974 and OMB Circular A-130 require procedures be in place to implement administrative, technical, and physical security controls for systems containing a system of records. | **9/2008**<br>☑ Yes, enter the date of the System Security Plan:_____<br>☐ No |
| **6. Is there a contingency (or backup) plan for the system?**<br>The Privacy Act of 1974 and OMB Circular A-130 require procedures be in place for implementing a contingency plan for systems containing a system of records. | ☑ Yes<br>☐ No |

## VI. Administrative Controls

| Question - Guidance | Enter Response in this Column |
|---|---|
| **7. Are files backed up regularly?**<br>OMB Circular A-130 requires procedures be in place for protecting data on systems in the event the system and the information it contains is attacked or rendered unavailable.<br><br>Agencies should devise a method for backing up information contained on the system at regular intervals. | ☑ Yes<br>☐ No |
| **8. Are the backup files stored offsite?**<br>Identify the alternative site for housing backup files. | ☑ Yes<br>☐ No<br>**Iron Mountain**<br>**Federal Center**<br>**Springfield, VA** |
| **9. Are there user manuals for the system?**<br>User reference manuals must describe how users who operate the system ensure PII is protected. | ☑ Yes **Manual Section 466 as well as a database User Guide**<br>☐ No<br>If No, then OMB Circular A-130 requires that each Agency assure the security of the PII contained on each system to include training of users and employees of security controls in place. |
| **10. Have personnel using the system been trained and made aware of their responsibilities to protect PII being collected and maintained?** | ☑ Yes<br>☐ No<br>If No, then OMB Circular A-130 requires that each Agency ensure the security of the PII contained on each system to include training of users and employees on the security controls in place on the system. |
| **11. Who will have access to the PII on the system?** | **Check all that apply.**<br>☑ Users<br>☑ Administrators<br>☑ Developers<br>☑ Contractors<br>☐ Public<br>Describe the purpose of each user's access to PII on this system. |
| **12. Are methods in place to ensure least privilege (i.e. only individuals who need access to the PII are able to access it)?** | ☑ Yes<br>☐ No<br>☐ N/A<br>If Yes, then specify the methods used to enforce least privilege below.<br>Least Privilege Enforcement Methods |

## VI. Administrative Controls

| Question - Guidance | Enter Response in this Column |
|---|---|
| **If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?** | ☑ Yes<br>☐ No<br>☐ N/A |
| **Are methods in place to ensure that access to PII is restricted to only those required to perform their official duties.** | ☐ Yes (If yes, please specify method (s))<br>☐ No<br>☑ N/A |
| **Are there policies or guidelines in place for the retention and destruction of PII within the system:** | ☑ Yes (If yes, please provide some detail about the policies/practices)<br>☐ No<br>**Manual Section 466**<br>☐ N/A |

## VII. Physical Controls

| Question - Guidance | Enter Response in this Column |
|---|---|
| **1. Are physical access controls in place to protect this system?** USADF must devise administrative, technical, and physical controls for each system to protect the PII it contains. OMB Circular A-130 requires that each Agency ensure the security of the PII contained on each system by implementing technical security controls. | ☑ Yes (If Yes, check all that apply in the list below.)<br>☐ Guards<br>☑ Identification Badges<br>☑ Key Cards<br>☐ Cipher Locks<br>☐ Biometrics<br>☑ Closed Circuit TV (CCTV)<br>☑ Locked Cabinet<br>☐ Oher - Lock and Key, Alarm<br>☐ No<br>If No, describe how appropriate security controls will be implemented for this system in accordance with the minimum baseline security controls defined in NIST 800-53, Recommended Security Controls for Federal Information Systems:_____<br>☐ N/A<br>**Sign-In Sheet** |