Privacy Impact Assessment

for

State Library Administrative Agency Survey

9 January 2024

Institute of Museum and Library Services Privacy Impact Assessment

State Library Administrative Agency (SLAA) Survey

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. <u>**Description of the system / project**</u>

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 (for example, within Microsoft Azure, Qualtrics, Drupal, etc.).*
  d. *How information in the system / project is retrieved by the user.*
  e. *Any information sharing.*

The State Library Administrative Agency (SLAA) Survey is a web-based data collection system that supports the biennial census of SLAAs in the 50 States and Washington DC. The SLAA Survey data collection operates through a data collection tool (SLAA Survey Tool) on Qualtrics with a robust edit check system to help with data quality. It houses personally identifiable information (PII) on the respondents.

The SLAA Survey Tool collects contact information from Key Holders (KHs) and Chief Officers of SLAAs from each state who report or certify data, depending on their role.

The SLAA Survey is a federal survey that collects data on SLAA identification, governance, public service hours, service outlets, collections, library service transactions, library development transactions, services to other libraries in the state, allied operations, staff, income, expenditures, and electronic services and other related information.

These data are the basis for a set of data files and other data products that IMLS releases every other year on imls.gov, which include a research report or brief, providing both current year and trend analyses.

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.)

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

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

Work-related data					
a. Occupation	X	b. Job Title	X	c. Work Email Address	X
d. Work Address	X	e. Work Telephone Number	X	f. Salary	
g. Employment History		h. Procurement/ Contracting Records		i. Employment Performance Rating	
j. Other work-related data:					

System Administration/ Audit Data					
a. IP Address	X	b. User ID/ Username	X	c. Date/ Time of Access	X
d. Queries Run		e. ID of Files Accessed		f. Personal Identity Verification (PIV) Card	

System Administration/ Audit Data
Other system administration/audit data: Qualtrics does log IP Address (a) and date/time (c), however, the admin dashboard will only give you a report of how many times a user has logged in during a given period. Each user has the ability to see their own recent history, which appears to only display the previous 30 logins. There is no apparent log of what was accessed or queried during the session (d & e). Qualtrics may have this information, but it is not readily available to end user admins.

2.2   Indicate sources 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:	Names, work emails, work phone numbers and work addresses from Key Holders and Chief Officers of SLAAs are voluntarily input by States and Chief Officers or other state representatives to support their official roles as respondents and certifiers of SLAA Survey data from their state.
Government Sources:	Names, work emails, work phone numbers and work addresses from Key Holders and Chief Officers of SLAAs to support their roles as respondent and certifier of SLAA Survey data from their state.
Non-Government Sources:	Contractor names, work phone numbers and work emails.
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 and minors within each category whose PII is contained within the system / project.

Members of the public	Contact information is collected from 51 Key Holders, employees of the State Library Administrative Agency nominated by their State Chief Officer to manage the State's collection of data from public libraries within their states. The Chief Officer certifies the survey data before final acceptance at IMLS. There is no data collected, disseminated, disclosed, used or maintained on minors within the system.

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IMLS employees/ contractors	SLAA Survey Tool: Approximately 5-7 Contractors (currently RTI) working on behalf of IMLS annually update the SLAA Survey Tool to reflect changes to the survey instrument, provide training to KHs, prepare collection materials, and manage the 8-10 week collection that starts in January of each odd numbered year. These Contractors also prepare the data for public use and prepare research for dissemination efforts after the collection ends. IMLS employees review the SLAA Survey data before public dissemination.
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 of 2018 (20 USC Ch. 72), OMB Circular A-130, etc.)

> IMLS collects these data under the mandate in the Museum and Library Services Act of 2018 (PL 115-410), as stated in section 210 (20 U.S.C. 72 §9108).

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

> Regarding PII of SLAA Survey respondents, IMLS sends out advance letters to KHs and Chief Officers a couple of months before each data collection. Generally States keep IMLS informed of any changes to the contact information of the KH, and IMLS keeps track of the Chief Officers through COSLA's website and Grants to States' State Profiles page https://www.imls.gov/grants/grants-state/state-profiles.
> Otherwise, the SLAA Survey Tool has a robust edit check system to catch potential errors in library-level data submitted by the KHs. KHs are asked to review and correct or annotate critical edit checks. Chief Officers then certify the data after the KH has submitted the files.

2.6 Is the information covered by the Paperwork Reduction Act?

> OMB No. 3137-0072 Expires 09/30/2025

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

> The records management plan is currently in development.

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

> The records management plan is currently in development.

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.)

> KH and Chief Officer contact information is collected and maintained in the system since they are the respondents and certifiers, respectively, of their State's submission to IMLS' SLAA Survey Tool for the biennial SLAA Survey collection.

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

> Yes, the system collects only the minimum amount necessary, in most cases only the name, work email and work institution.

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.)

> We use the information to contact the KHs and Chief Officers in October of each year in advance of the opening on the annual SLAA Survey collection the following January.

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

Social Media	
Web-based Application (e.g., SharePoint)	

Data Aggregation/ Analytics	
Artificial Intelligence/ Machine Learning	
Persistent Tracking Technology	
Cloud Computing	
Personal Identity Verification (PIV) Cards	
None of these	X

Section 4. **Information Security and Safeguards**

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

Yes? Explain.	
No, this system / project does not connect with, obtain, nor share PII with any other IMLS system or project.	X

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

Yes? Explain. (Please also describe the type of PII shared, the purpose for sharing it, the name of the information sharing agreement, and how the PII will be shared.)	
No, this system / project does not connect with, obtain, nor share PII with any external system or project.	SLAA Survey data files with KH respondent names are not released to the public and the system doesn't connect with any other system/project.

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

N/A

4.4 Identify who will have access to the system / project and the PII.

Members of the public	Key Holders and Chief Officers of State Library Administrative Agencies
IMLS employees/ contractors	IMLS employees, RTI contractors, IT staff and contractors

Other (explain)	

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.	X (not to our knowledge)

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

Only authorized internal and external users have access to the SLAA Survey Tool. Accounts are established based on the States' designation of individual as the KH for that cycle.

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.

Risks to the third-party system include a data breach, malicious code or hacking, etc. The front-end admin panel in Qualtrics does allow for some security settings, such as dictating a password expiry time, minimum password length, and or the need to have special characters in the password. It does also offer the ability to create user types (or roles) with different levels of permissions.

4.8 Under NIST FIPS Publication 199, what is the security categorization of the system / project? Low, Moderate, or High?[1] (Please contact OCIO if you do not know.)

Low	**X**

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[1] 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.

Moderate	
High	

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.

> The data collection contractor (currently RTI, but AIR starting for the FY 2024 SLAA Survey cycle) and OCIO regularly update the System Security Plan for the SLAA Survey Tool, ensuring all security controls necessary for FISMA Low are completed.

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 systems and records notice (SORN) that was published in the Federal Register and is discussed in the next section.	
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):	
Yes, notice is provided by other means:	
No, notice is not provided. Please explain why:	Notice is not currently provided by IMLS as the contact information is generally volunteered by the SLAA. During this fiscal year we plan on adding a privacy notice to the website.

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:	**X**
	No, individuals do not have the opportunity to consent to uses of their PII.	
Decline	Yes, individuals have the opportunity to decline to provide their PII:	
	No, individuals do not have the opportunity to decline to provide their PII.	**X**
Opt-out of	Yes, individuals have the opportunity to opt-out of the system / project:	
	No, individuals do not have the opt-out of the system / project.	**X**

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.

> KHs are encouraged to reach out to IMLS or the contractor with changes to their work email to ensure that IMLS can successfully communicate with the KHs before and during the SLAA Survey data collection period.

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 some identifying number, symbol, or other identifying particular assigned to the individual." [2]

Yes, a 'system of records' is created by this system / project.	
No, a 'system of records' is not created by this system / project.	**X**

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

Section 7. <u>**Assessment Analysis**</u>

The SLAA survey is a web-based data collection administered through Qualtrics. Qualtrics is ISO 27001, FedRAMP, HITrust, and SOC2 Type 2 certified. In addition to those security qualifications, IMLS has established appropriate controls for access to the survey data and system based on an individual's roles and responsibilities. The agency also has a thorough process of ensuring that accurate information is maintained within the system and only the minimum amount of information is collected. The agency will seek to add a privacy notice to the SLAA website entry portal this year and continue to monitor the security and privacy of the data maintained within the system.