

**Privacy Impact Assessment
National Museum of Natural History
Research and Collections Information System**

I. System Identification

1. IT System Name: Research and Collections Information System (RCIS)
Unique Project Investment Identifier 452-00-01-02-01-1007-00-106-017
2. IT System Sponsor: Cristián Samper K., Director
3. System Sponsor Unit: National Museum of Natural History (NMNH)
4. IT System Manager: Thomas Orrell, Informatics Branch Chief
5. PIA Author: Beth L. Gamble for Thomas Orrell
6. SI Unit Director or Designee: Matthew McDermott, Assistant Director for Information Technology
7. Date: May 2009

Brief (one paragraph) description of the system:

The National Museum of Natural History (NMNH) Research & Collections Information System (RCIS) collects and stores text and image information pertaining to objects in the NMNH collections. This includes the intellectual significance, physical characteristics, and legal status of collection items, and ongoing and some historical collections management transactions and processes. The system helps NMNH fulfill its stewardship responsibility for the collections it holds on behalf of the American public. This responsibility, as well as legal issues inherent in relationships with donors, vendors, and others, demand that collections be managed to the highest standards of security and safety and in a manner that provides the greatest benefit to the public. The RCIS facilitates full physical and legal control of collections as required by law; inventories are maintained and conditions of collection objects are recorded in a uniform way.

II. Privacy Assessment

1. What information is being (or will be) collected.

RCIS maintains information about individuals who have a relationship with objects in the Museum's collection. This relationship can be that of a donor, a lender to or borrower from the collection, a collector, manufacturer, artist, subject, author, etc. Information about donors, lenders or borrowers is usually obtained from correspondence with the individuals involved. Historical and intellectual information about other constituents can be extracted from other sources such as NMNH archives.

Information is limited to names, addresses (including e-mail) and some biographical information where appropriate including date and place of birth. NMNH obtains current contact information from individuals with whom there is an ongoing transaction such as a loan, or a copyright restriction, via correspondence (including both written and e-mail).

2. Why the information is being collected.

- 1) NMNH maintains legal documentation relating to the acquisition and ownership of collections objects. This information establishes legal title for collections objects in NMNH's care.
- 2) Historically relevant biographical information is maintained for research purposes.
- 3) Contact information is maintained for private individuals involved in on-going, collections relevant transactions with the museum.

3. The intended use of the information.

Use of personal privacy-related information collected by the RCIS is limited to: a) recording legal transactions of objects in our collections; b) recording biographical information for educational and research use; and c) storing contact information for individuals who are engaged in ongoing transactions with the museum, such as lending or borrowing objects from the collection. No printed reports are distributed.

4. With whom the information will be shared.

Access to personal data or the ability to enter or edit RCIS data is restricted to museum and affiliated agency personnel and contractors and controlled by the system administrator. It is available to those persons over the Smithsonian Institution's internal network (SInet). Access is limited to those individuals who need it to perform the duties of their job relating to the collections, in collections management, research or public programs. Each individual's access must be approved by their supervisor and the system administrator. Levels of access can be assigned at the field level for each individual user according to duty needs. This access is revoked promptly whenever any of these users leaves or changes jobs.

The general public's access to RCIS is restricted to a limited set of information about the collections. This list is available in the museum's data access policy (http://www.mnh.si.edu/rc/db/collection_db_policy1.html and http://www.mnh.si.edu/rc/db/2data_access_policy.html). This may include details of provenance or collection and may include names of certain individuals (especially collectors) unless specific requests are made by individuals that we not make those information publicly available.

A similarly restricted set of data fields related to NMNH's biological collections may also be made available via the National Biological Information Infrastructure (USGS-NBII), the Global Biodiversity Information Facility (GBIF), and the Ocean Biogeography Information System (OBIS). There are no other interfaces with other systems, either internal or external to the Smithsonian.

5. What notice or opportunities for consent would be provided to individuals regarding what information is collected and how that information is shared.

The biographical and contact information that is collected in the system is obtained from NMNH records and publicly available sources. Individual inquiries into NMNH privacy-related information can be made in writing to:

Registrar
National Museum of Natural History
PO Box 37012
Washington DC 20013-7012

6. How the information will be secured.

RCIS protects sensitive data from unauthorized access and/or disclosure, assures integrity of data stored in electronic form, and protects data from unauthorized alteration or modification. RCIS is controlled with respect to access, authority to modify, and ability to operate it. Museum researchers, curators, registrars, and managers access the system through desktop workstations. RCIS requires users to authenticate their identity through the entry of a user ID and password. The system allows access only to authorized users based on user profiles. Levels of access to the RCIS are controlled by the system administrator based on the individual needs of the user, as determined by both their supervisor and the system administrator. The system has field level security, with three levels: unavailable, read-only, and edit, configurable to individual work needs. All new users must be sponsored by their supervisor. Access is revoked promptly when a person leaves or changes jobs.

RCIS is certified and accredited using guidance contained in Federal Information Processing Standard Publication 102 and National Institute of Standards and Technology Special Publication 800-37 Guide for the Security Certification and Accreditation of Federal Information Systems. The Smithsonian's certification and accreditation program is based on a risk assessment and testing of controls commensurate with the importance and sensitivity of the system and acceptance of risk and authorization to operate by the program sponsor and the Chief Information Officer.

The RCIS operates on servers behind the SI firewall that do not allow any access from the Internet. Client software is required in order to access the system. RCIS data that are approved for public access are maintained on a separate server in the DMZ of SINet allowing access from the Internet. Only those records and fields that have been approved and designated as accessible are copied to that server. Servers are physically protected in a secure computer room, where access is limited to authorized personnel. Servers are regularly patched to the current level. System logs are reviewed on a weekly basis to check for anomalies such as hacking attempts. All privacy-related information stored on the RCIS is relevant to the collection or the history of the collection and is thus retained in perpetuity. All backups are retained for a limited time period and kept off-site in a secure facility with limited, controlled access.