

ATTACHMENT A

Agency Privacy Policies: Plans, Policies, and Compliance

Please answer the following questions regarding your agency's privacy plans, policies and compliance with Privacy directives, legislation and regulation.

PART 1. PRIVACY POLICY OVERSIGHT	
Question	Description
<u>Authorities.</u> Describe any authorities and oversight that are specific to your agency, as established by Congress, OMB and GAO.	12 U.S.C. 3331-3351. No ASC-specific Privacy related provisions exist.
<u>Privacy Guidelines.</u> Describe your privacy guidelines for systems of records as defined in the Privacy Act or other activities covered by privacy guidelines.	We have implemented the Privacy Act by adopting rules at 12 CFR part 1102 subpart C and by publishing record system and use notices in the <i>Federal Register</i> (57 FR 11084 (April 1, 1992) and 63 FR 52269 (September 30, 1998)).
<u>Necessary Data.</u> Describe the internal agency guides that you use to interpret and comply with the authorities of your agency. Also describe the data necessary for the execution of these authorities.	Not applicable. We only use the Privacy Act, our rules, and our published system of records and allowable uses notices.
<u>Oversight of Contractors.</u> How do you ensure that any systems operated by a contractor for the Federal Government follows your agency privacy policies?	We have one contractor. This contractor handles our internet Web site and provides access to National Registry of Real Estate Appraisers data. The contractor is bound by contract to comply with the Privacy Act, among other Federal legal requirements.
<u>Enterprise Architecture and Capital Planning and Investment Control.</u> Describe the privacy policies and standards that are a part of your Enterprise Architecture (as required by the Clinger-Cohen Act of 1996) and your Capital Planning and Investment Control process (as required by OMB Circular A-11, Section 300).	GSA's Agency Liaison Division handles our compliance with these provisions.
<u>Privacy Oversight.</u> Describe the positions charged with overseeing the implementation and evaluation of your privacy policies and standards, including implementation of the Privacy Act?	Executive Director and General Counsel.

(a) What are their relationships to the Agency Director? What are their relationships to the Chief Information Officer?	The Executive Director is the Agency Director. The General Counsel is the Chief Information Officer. We are a tiny agency with only seven FTE's.
(b) Does the Officer or Division which oversees the privacy policies and standards have the resources and authorities to carry out their duties and responsibilities?	Yes.
(c) What additional duties does this Privacy Officer have within the agency?	General Counsel.
<u>Communications and Training.</u> How does your agency communicate to and educate personnel on agency privacy policies and standards?	Because of our small size, personnel are advised and counseled on an ad hoc basis.
(a) How do you inform personnel of changes and updates to privacy policies?	Copies are provided.
<u>Non Automated Work Processes.</u> Privacy policies also apply to non-automated data necessary to the execution of your agency's authorities. Please describe your agency's privacy policies in the management of this data throughout its life cycle.	No data leaves the agency unless it is reviewed by the Executive Director and the General Counsel.
PART 2. OVERALL INFORMATION TECHNOLOGY SYSTEMS PRIVACY	
Question	Description
<u>Web Enabled Data.</u> If identifying data that is Web enabled, discuss your agency's processes for compliance with OMB Memorandum M-99-18 'Privacy Policies on Federal Web Sites', dated June 2, 1999, and Memorandum M-00-13, 'Privacy Policies and Data Collection on Federal Web Sites', dated June 22, 2000, and the letter from OIRA Administrator John Spotila dated September 7, 2000, that clarified certain technical aspects of M-00-13.	See 63 FR 52269 (September 30, 1998). We also have published ASC Policy Statement 8, which, among other things, describes our privacy policies pertaining to the National Registry. Moreover, our Web site's "E-FOIA" reading room contains documents that are redacted to safeguard Privacy Act protected data.
(a) If you have web sites targeting children under thirteen, have you made sure that you have complied with the Children's Online Privacy Protection Act of 1998?	Not applicable.
B. <u>Privacy Across Systems Life cycle.</u> Does your agency's IT systems life cycle require privacy policies from initial conception and throughout the life cycle?	Not applicable. Our IT systems, other than the National Registry, do not capture Privacy Act protected information.

(a) If so, describe the privacy policy formation process regarding IT system development, including any use of privacy impact assessments. If not, describe your agency's plans to implement such this requirement.	Not applicable.
PART 3. ADDITIONAL PRIVACY COMMENTS	
Question	Description
A. <u>Addition Concerns</u> . Are there privacy issues or concerns specific to your agency that we have not addressed in this Report? If so, please identify and explain.	No.