

PRIVACY IMPACT ASSESSMENT

Submit in *Word format* electronically to: Judy Hutt (hutt.judy@epa.gov)

Office of Environmental Information

System Name: My Workplace		
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Date: 3/28/13	Phone: 202-566-0696	
This project is in the following stage(s):		
Definition <input type="checkbox"/>	Development/Acquisition <input checked="" type="checkbox"/>	Implementation <input checked="" type="checkbox"/>
Operation & Maintenance <input type="checkbox"/>	Termination <input type="checkbox"/>	

I. Data in the System

1. Describe what data/information will be collected/contained in the system.

The system will allow users to retrieve the following information for EPA employees and contractors on the EPA network: user name, common name, email address, title, business and personal contact information (telephone numbers, mail codes, office locations), and organizational chart and hierarchy information. Those users who participate in MySites will have the ability to publish additional personal information, such as photographs, projects they have or are working on, skill sets, interests, workgroup and community affiliations, education, publications, notes, messages and other content.

2. What are the sources and types of the data/information in the system?

Information will be retrieved from EPA's Active Directory as well as input by users.

3. How will the information be used by the Agency?

My Workplace, utilizing the Microsoft Office 365, will allow users to set up team collaboration workspaces, facilitate sharing of documents, policies and information, and allow networking through the SharePoint features, including MySites.

4. Why is the information being collected? (Purpose)

The purpose of the new system is to enhance and improve efficiencies in the dissemination and exchange of information within the Agency and allow colleagues to connect with each other.

II. Access Controls for the Data

1. Who will have access to the data/information in the system (*internal and external parties*)? If contractors, are the Federal Acquisition Regulations (FAR) clauses included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)?

EPA employees, contractors on the EPA network, and invited stakeholders will have access to information in My Workplace. Federal Acquisition Regulations (FAR) clauses are included in the contract for My Workplace.

2. How have you educated those having authorized access about the misuse of PII data?

Training will be provided on the proper use of the system and clear Terms Of Use will be provided to ensure users are aware of restrictions on the use of PII data.

3. Do other systems share or have access to data/information in this system? If yes, explain who will be responsible for protecting the privacy rights of the individuals affected by the interface? (*i.e., System Administrators, System Developers, System Managers*)

No.

4. Will other agencies, state or local governments share or have access to data/information in this system (*includes any entity external to EPA.*)? If so, what type of agreement was issued? (*i.e., ISA, MOU, etc.*)

My Workplace allows employees and authorized contractors to collaborate with external partners. External partners will only have access to the specific information for which they are granted access and will not be able to access any information to which they are not explicitly authorized. Employees, contractors, and external parties will be required to agree to the Terms Of Use which provide guidelines on the proper use of the system.

5. Is the data and /or processes being consolidated? If so, are the proper controls in place to protect the data from unauthorized access or use?

Data is being consolidated from multiple sources. Records in the system are protected from unauthorized access and misuse through various administrative, technical and physical security measures. Technical security measures within EPA include restrictions on computer access to authorized individuals, required use of strong passwords that are frequently changed, use of encryption for certain data types and transfers, and regular review of security procedures and best practices to enhance security. Physical measures include restrictions on building access to authorized individuals only and maintaining records in lockable offices and filing cabinets. The system adheres to the Federal Information Security Management Act (FISMA) guidelines for the proper protection of information assets with a moderate security classification.

III. Attributes of the Data

1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed.

The information in My Workplace is necessary to help improve communication and collaboration within the Agency. The SharePoint environment will include Agency policies, procedures, forms, organization charts, links to other sites that are helpful for users, and links to other EPA SharePoint sites containing shared documents and other information. It will include content regarding program and regional offices, services and support, and projects and activities. My Workplace will include a directory of all users, including titles, contact information and a professional photo. The MySites feature will allow users to set up a personal profile, upload pictures, and publish content and messages that are similar to email. MySites also allows users to join groups, connect with colleagues and receive a newsfeed when new information is posted.

2. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier more than 50% of the time? If yes, explain. (*A personal identifier is a name, Social Security Number, or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual.*)

It is anticipated that information will be retrieved by personal identifier more than 50% of the time. The system will allow users to retrieve information about employees based on name, telephone number, job title, current and past projects, and other information available through text string searches.

3. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? If yes, how is notice given to the individual? (*Privacy policies must clearly explain where the collection or sharing of certain information may be optional and provide users a mechanism to assert any preference to withhold information or prohibit secondary use.*)

Some information such as name, phone number, organization, and job title will be retrieved from pre-existing official systems of record, so employees will not have the ability to decline participation. Other information, such as profile picture, background information, work history, etc., will be made available at the discretion of the employee. The Terms Of Use will make it clear that employees have a right not to provide personal information.

4. Where is the Web privacy policy stated?

<http://intranet.epa.gov/oei/imitpolicy/qic/pdfs/cio2151.0.pdf>

IV. Maintenance and Administrative Controls

1. Has a record control schedule been issued for the records in the system? If so, provide the schedule number. (*You may check with the record liaison officer (RLO) for your AA-ship or Tammy Boulware (Headquarters Records Officer) to determine if there is a retention schedule for the subject records.*)

My Workplace is not a records management system. Therefore, a records disposition schedule has not been issued for My Workplace. Information in My Workplace which pertains to official

agency records should be copied to the appropriate records management system and maintained and/or dispositioned in accordance with records disposition schedules approved by the National Archives and Records Administration (NARA). The Records Management Team is in the process of developing an automated system to facilitate the process of copying records in My Workplace to the Agency's official records management system.

2. While the data are retained in the system, what are the requirements for determining if the data are still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

Information is reviewed for accuracy by employees on a regular basis. Employees can use the feedback mechanism built into the system to report inaccurate information so that it can be corrected.

3. Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain.

Yes. The Lync tool includes a capability of determining whether or not an employee is online and if not, how long they have been away from the computer. The "default" option is to have this capability active, employees can, however, "deactivate" this feature for the day.

4. Does the system use any persistent tracking technologies?

No.

5. Under which System of Records (SOR) notice does the system operate? Provide the name of the system and its SOR number if applicable. A list of Agency SORs are posted at <http://www.epa.gov/privacy/notice/>. (A SOR is any collection of records under the control of the Agency in which the data is retrieved by a personal identifier.)

The System of Records Notice for My Workplace is currently in process.