

PRIVACY IMPACT ASSESSMENT

Submit in *Word format* electronically to: Linda Person (person.linda@epa.gov)

Office of Environmental Information

System Name: Engine and Vehicle – Automated Commercial Environment (EV-ACE)	
Preparer: Mike Heese	Office: OAR/OTAQ
Date: 08/06/2013	Phone: 202-343-9332
This project is in the following life cycle stage(s):	
Definition <input type="checkbox"/> Development/Acquisition <input type="checkbox"/> Implementation <input type="checkbox"/>	
Operation & Maintenance <input checked="" type="checkbox"/> Termination <input type="checkbox"/>	
Note: Existing Systems require an updated PIA when there is a significant modification or where changes have been made to the system that may create a new privacy risk. For a listing of significant modifications , see OMB Circular A-130, Appendix 1, Section (c) (1) (a-f) at http://www.whitehouse.gov/omb/circulars/a130/a130appendix_i.aspx	

I. Data in the System

1. What data/information will be collected/contained in the system?

The EV-ACE system collects basic contact information (name, address, e-mail and phone number).

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

The information is collected from individuals who are seeking an exemption from the Clean Air Act requirements for importing vehicles or engines. The information is emailed or faxed to the OTAQ Imports group who then enters it into the system. If the applicable criteria for receiving an exemption is met, EPA issues an approval letter which is sent to the requester at the email or mailing address they provide to us. This letter is then presented to Customs and Border Patrol (CBP) when the product arrives at the port to facilitate entry into the United States. If the applicable criteria for an exemption have not been met, a denial letter will sent to the requestor outlining the reasons for denial.

3. If the system has been modified, are the original personally identifiable information (PII) elements still being collected or contained in the system? If no, what are the elements currently being collected? When did the collection of the original PII elements stop? How was the old data removed from the system?

This is a new system.

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

The information may be used in the following ways: (a) to correspond with the individual who requested the exemption and (b) in the case an exemption is issued, to identify the individual to which the exemption was issued.

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

The information is being collected in order to correspond with an exemption requester and to identify the individual an exemption was issued to.

II. Access Controls for the Data

1. To ensure user authentication, does the system have limited login attempts or require security question answers? If yes, when the user becomes locked out how will they gain access to the system?

Verify is integrated with the EPA single sign on, users have three attempts, their accounts will be locked after three attempts and can only be unlocked by a system administrator.

2. How often are passwords required to be changed?

Passwords are required to be changed every 90 days.

3. 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 Staff and contractors who process exemption requests will have access to the information in order to perform their duties of evaluating the requests. Also EPA Staff and contractors who support the EV-ACE System may have access to the data. There are 4 contracts in place where contractors have access to the EV-ACE information. Two of the contracts have the FAR clauses included. The third contract that oversees the imports exemptions application process for EV-ACE is in the process of being awarded. The new contract does contain the Federal Acquisition Regulations (FAR) clauses. The fourth contract is used to do development work on the system. The Statement of Work (SOW) for this contract is being updated to include the FAR clauses.

4. How will you educate individuals/users having authorized access about the misuse of PII data? Will users receive privacy training before gaining access to the system?

Before gaining access to the system users are required to read and sign the Rules of Behavior. The Rules of Behavior addresses the misuse of PII data.

5. Has the data in the system been encrypted according to the National Institute of Standards and Technology (NIST) requirements? (Note: this requirement is for sensitive PII only)

Sensitive PII is not collected.

6. Do other systems share or have access to information in this system? If yes, who authorized the sharing? If information is being shared, please provide a copy of any agreements that were issued. (*i.e., System Administrators, System Developers, System Managers*)

No.

7. Will other agencies, state or local governments, or other external parties (i.e., non-EPA) share or have access to information in this system? If so, what type of agreement was issued? (i.e., ISA, MOU, etc.) (If any agreements were issued, the Privacy Program needs a copy for its records.)

No.

8. Will data and/or processes be converted from paper to electronic? If so, what controls are in place to protect the data from unauthorized access or use?

The system employs role based authorization so users are only granted access to the information that is relevant to the roles that have been assigned to their account.

9. Will data be shared from a system of records (SOR) with another federal agency? If so, has a computer matching agreement been initiated?

The PII will not be shared with another federal agency.

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. (*Provide an example or explain*)

The system is designed to process requests for exemptions from the requirements of the Clean Air Act. The information is necessary to identify an individual who has requested an exemption.

2. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? If yes, what identifier(s) will be used. (*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.*)

The system is designed to retrieve an exemption request by the requestors name, address, phone number, or email address.

3. Has the system undergone a risk analysis to identify harms that may result from technical failures, malevolent third parties or human error? Yes No (**Note: The risk analysis will help identify possible risks to the data in the system.**)

4. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? Yes No 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.*)

5. Where is the on-line privacy policy posted?

<http://www.epa.gov/privacy/policy/2151/>

IV. Maintenance and Administrative Controls

1. Has a record control schedule been issued for the records in the system or the system itself? 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. All systems **must** have a record control schedule.)*

EPA Records Schedule 485

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

The information originates from the requesters themselves, so it is to their benefit to provide accurate information and keep it updated by notifying EPA of any changes.

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

No.

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. All 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 SOR **must** contain the same categories of records and cover the same routine uses as your system.)*

The SOR is in development.