

January 2013

U. S. Environmental Protection Agency Plan for Reducing Personally Identifiable Information

The **EPA Privacy Policy**, issued in 2007, establishes the framework and accountability for reducing Agency personally identifiable information (PII) by:

- Establishing Agency-wide accountability for collecting and safeguarding PII across the enterprise.
- Prohibiting the collection and use of full social security numbers to access IT systems unless disclosure of SSN is required by law.
- Establishing requirements to minimize the collection of PII and safeguarding its collection and use.

The Agency will conduct reviews throughout the reporting year and provide progress updates in its annual report under the Federal Information Security Management Act (FISMA). Some reviews will be conducted in accordance with the Agency's schedule for complying with OMB Circular A-130 Appendix I.

Review Agency System of Records Notices (SORNs)

Reassess the Agency's need to continue to collect the PII elements and to eliminate unnecessary elements, or the SORN, if found to be no longer needed.

- Elimination of unnecessary Privacy Act collections and/or PII data elements. Program offices directed to prepare paperwork to make the necessary changes (i.e., modify or delete) the subject SORN.

Survey Agency forms and systems that collect social security numbers (SSNs)

Determine authority for the collection and current need; Identify alternative methods of identifying subject individuals where possible

- Inventory of SSN collections in the Agency.
- Possible reduction of SSN collections.

Develop system-appropriate plans of actions to eliminate, truncate or eliminate SSN displays

- Elimination of unnecessary SSN collections.

Review Agency forms for PII elements

Determine if PII is collected; if any/all PII elements on the forms are needed; ensure Privacy Act Statements (PAS) are present; ensure adequacy of PAS; ensure all forms used by offices have been issued via the Agency's form review process.

- Identification of all uses of PII in Agency processes and ensures that programs are only collecting the PII needed to conduct Agency business.
- Elimination of unnecessary PII elements on forms.

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Develop online privacy trainings

- Greater capability to raise awareness regarding the inappropriate or unnecessary collection of PII.

Maintain inventory of Agency systems that contain PII

- Identification of unnecessary PII collections and/or data elements.



**U.S. Environmental Protection Agency
Implementation Plan for Reducing Personally Identifiable Information**

1. Action Item: Established Agency baseline of all systems that contain PII FY13
 - a. *Outcome:* Identification of all systems that collect any type of PII.
 - b. *Outcome:* Identification and elimination of unnecessary PII collections and/or data elements

2. Action Item: Review Agency System of Records Notices (SORNs) FY13
 - a. *Purpose:* To reassess the Agency's need to continue to collect the PII elements and to eliminate any elements, or the SORN, if no longer needed.
 - b. *Outcome:* Elimination of unnecessary Privacy Act collection and/or PII data elements. Program offices directed to prepare paperwork to make the necessary changes (i.e., modify or delete) the subject SORN.

3. *Action Item:* Survey Agency Forms and systems that collect SSNs; determine current need for SSN; alternative methods of identifying subject individuals, etc. FY13
 - a. *Outcome:* Elimination of unnecessary SSN collections.

4. *Action Item:* Review all Agency forms to: determine if PII is collected; determine if any/all PII elements on the form are needed; ensure Privacy Act Statement (PAS) is present; ensure adequacy of PAS; and ensure all forms used by the program has been included on the major list of Agency forms issued by OARM. FY13
 - a. *Outcome:* Identification of all uses of PII in Agency processes and ensures that programs are only collecting the PII needed to conduct Agency business.
 - b. *Outcome:* Elimination of unnecessary PII elements on forms.