PRIVACY IMPACT ASSESSMENT

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Office of Environmental Information

System Name: Environmental Assessments for Residential Properties (EARP)	
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This project is in the following life cycle stage(s):

Definition ☐   Development/Acquisition ☐   Implementation ☐

Operation & Maintenance ☒   Termination ☐

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?

Information associated with environmental assessments on residential properties. The normal environmental meta\data such as sample number, sample date will be captured, along with information associated with the property itself such as address, owner name, tenant name, information describing attributes of the property, and other information required for that particular assessment.

The types of data collected in environmental assessments include names of residents, address information, phone number or other contact information, test results from environmental sampling, structural information such as the age of the structure, information about the service lines, plumbing and pipe information, and building materials in the structure, information about the length of residence or ownership of the structure, and GIS coordinates.

Other data elements may also be collected if needed for the environmental assessment or emergency response activity. These data will be maintained in a database where they may be filtered or searched on individual data elements.

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

Residential data is aggregated from local tax records, by surveying the residents themselves when working in a particular residential area. Information relating to the residents is everything required to conduct environmental assessment activities for clean-up and remediation work

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?

Yes. PII elements are still collected and contained within the system. This information is collected to ensure an appropriate and cohesive response to emergency situations and to protect the health and welfare of residents potentially affected by an environmental or public health emergency, and accessible as needed for coordination of environmental response activities.

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

The agency will use the residential identifiers and associated environmental data to make decisions on the nature and extent of contamination affecting the properties.

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

The information is being collected so that EPA can associated the sampling, analytical and other assessment data with the appropriate residential property. Through this association EPA will be in a position to make decisions on whether a property needs further actions such as remediation or if there is no further action required.

II. <u>Access Controls for the Data</u>

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?

Information relating to this system is stored on government furnished equipment (GFE) which has mandated access controls such as PIV card access and network password requirements. Should a user become locked out of their GFE they would contact their local IT help desk for assistance.

2. How often are passwords required to be changed?

Passwords on agency GFE are 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)?

Records protected under the Privacy Act are subject to Agency-wide security requirements. For information in Agency databases, privacy is maintained by limiting access to the database that contains the personal information with the appropriate access controls in place. The controls are assessed on regular basis as part of the system rick assessment processes. Access to the database is limited to individuals designated as System Administrators, Remedial Project Managers, Data Sponsors, On-Scene Coordinators, Information Management Coordinators, Budget Coordinators, Regional or Headquarters Attorneys, Regional or Headquarters Managers, Data Entry Support Staff, Support Contractors, and any other EPA staff with

assigned responsibilities that require access to the data. In certain circumstances, limited access to the database systems may be provided to state and local public health authorities in conformity with federal, state, and local laws when necessary to protect the public health or safety.

Yes. The FAR clauses are included in the appropriate support contracts.

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?

Default agency IT security training.

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)

No, system does not contain sensitive PII.

6. Do other systems share or have access to information in this system? Yes_X_ No__. 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*)

The Superfund project managers (On-Scene Coordinators and Remedial Project Managers) may in the course of the assessment and decision making process may need to share information about residential assessments with other Federal Agencies, state agencies or local administrations. This sharing is done on a site by site basis in order for the appropriate public health determinations to be made for a particular residence.

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?

No

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

No

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*)

In the course of EPA assessments, EPA finds that there are often times the potential for releases to impact residential properties. To complete the assessments and public health evaluations related to the release

EPA must specifically assess individual properties. Over the course of that assessment in addition to collecting information about the samples and field measurements, information about the property is also collected. This information is required so that the results related to the assessment can be associated with a residence so that clean-up decisions, and notifications can occur after the assessment is complete. For example, there may have been a factory which used a chemical solvent in the early 1900's, and while that factory was operating they spilled many gallons of material. The solvent eventually migrated to the groundwater, contaminating it and the all of the nearby residential drinking wells at homes surrounding the factory. In the course of the investigation, EPA would need to assess each residential well which includes obtaining legal access to sample and who owns the well. Once the sample is analyzed EPA would notify the resident of the results by retrieving information based on their address and would potentially work with another Federal Agency such as ATSDR to determine if a mitigation system needed to be installed at that property based on the results. This process requires that EPA associate all samples with a properties during the assessment, store information about the property itself and share that information with other Agencies that are part of the decision making process for that particular assessment activity.

2. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? YesX No_. 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.)*

When doing residential assessment work the information is typically organized so that it can easily be retrieved by owner name or address so that proper notifications to the residents can occur.

The Agency will retrieve information based on the PII so that residents can be notified of the results on their individual properties. EPA needs the ability to retrieve information on a property so that the results of the assessment can be sent to the property owner.

3. Has the system undergone a risk analysis to identify harms that may result from technical failures, malevolent third parties or human error? Yes_X_ No___ (**Note: The risk analysis will help identify possible risks to the data in the system.**)

Yes, components of the system responsible for delivering or visualizing the environmental assessment data, such as Scribe.NET and EPA Geoplatform have gone through the risk assessment process.

4. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? Yes_X_ 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.)*

No information is collected and stored during the course of a residential assessment without initially receiving a signed access agreement from the property owner. The access agreement will also contain information relevant to the Privacy Act notice. This agreement is what allows EPA access to the property for the collection and analysis of the samples associated with the assessment.

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

EPA's Privacy Policy is available at: http://www.epa.gov/sites/production/files/2015-09/documents/2151.1.pdf

IV. <u>Maintenance and Administrative Controls</u>

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.*

Yes. OSWER Record Liasion officer gave approval to use older EPA Record Schedule 061 until NARA approves new consolidated Superfund record schedule.

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 project managers are ensuring that the information is updated according to the needs of that particular assessment.

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

No, except as necessary to notify individuals of the results of assessment activities on their properties.

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.)*

SOR, EPA-74,