

PRIVACY IMPACT ASSESSMENT

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

Office of Environmental Information

System Name: Acquisition Training System		
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Date: 10/12/16	Phone: (202) 564-4339	
Reason for Submittal: New PIA <input type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input checked="" type="checkbox"/>		
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/Decommissioned <input type="checkbox"/>	
<p>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</p>		

I. Data in the System

1. What data elements will be collected/contained in the system?
Name, organization(program office), work phone number, work email address, contract training class name, contract training date and contract training interim certification status.
2. What are the sources (people/systems) and types (categories) of the data/information in the system?
Training records for the EPA contract manager certification program including: Name, organization(program office), work phone number, work email address, contract training class name, contract training date and contract training interim certification status.
3. Why is the information collected? (Purpose)
To assure a proficient contract management workforce by identifying EPA employees who are eligible to be or have been certified as Contract Managers.
4. How is the information collected?
Via email sent to OAM/PTOD staff or from course rosters obtained from trainers.

5. Is this a paper and/or electronic collection of data?
Electronic

6. How will the information be used by the Agency?
To assure a proficient contract management workforce by identifying EPA employees who are eligible to be or have been certified as Contract Managers.

7. If the system has been revised or terminated, are the original personally identifiable information (PII) elements still being collected or contained in the system? Yes___ No___. 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?
The system has not been revised since initial setup.

II. Access Controls for the Data

1. Do the systems have access control levels within the system to prevent authorized users from accessing information they don't have a need to know? If so, what control levels have been put in place? If no controls are in place why have they been omitted?
Yes, access to system limited to PTOD employees.

2. 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)**
N/A since there is no sensitive PII.

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_X_ **(Note: The risk analysis will help identify possible risks to the data in the system.)**

4. How will you educate individuals/users having authorized access about the misuse of PII data? What type of training will users receive?
System relies on the mandatory EPA training such as the ISAT training to educate users about the misuse of PII data.

5. Who (*internal and external parties*) will have access to the data/information in the system? 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)?
Internal use only.

6. Will other systems, agencies, state or local governments or other external parties (i.e., non-EPA) share or have access to information in this system? Yes___ No_X_. If yes, what type of agreement was issued (*i.e., ISA, MOU, etc.*)? **If any agreements were issued, please supply the Privacy Program a copy of the agreement.**

7. 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?
Data is electronic only.

III. Attributes of the Data

1. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes_X_ 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.*) Information can be retrieved by name or organization.

2. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? Yes___ No_X_ 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.*)

3. Where is the privacy policy (paper-form)/notice (electronic-webpage) posted?
Since the system is for internal EPA usage only, the users are presented a privacy policy notice upon login.

4. Has a record control schedule been issued for the records in the system or the system itself? If so, provide the schedule number.
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5. 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?
PII information such as name, organization, phone number and email address are pulled from the EPA's domino directory.

6. Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain.
No.

7. Does this system use any persistent tracking technologies?
No.