

# PRIVACY IMPACT ASSESSMENT

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Office of Environmental Information

System Name: Case Application for Debarment and Suspension (CADS)

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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](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 Case Application for Debarment and Suspension (CADS) contains case management records, official documents, and materials that support the EPA's Suspension and Debarment Program (SDP) with their mission to protect the government from individuals or entities responsible for the misconduct of federal funds. Records include information on individuals and firms excluded or considered for exclusion from Federal acquisition or assistance programs as a result of suspension or debarment proceedings initiated by EPA. Such information includes, but is not limited to, names and addresses of individuals covered by the system of records, evidence obtained in support of Action Referral Memoranda and Case Closure Memoranda, interim decisions, compliance agreements, audits of compliance agreements, and final determinations. Examples of evidence contained in files include correspondence, inspection reports, memoranda of interviews, contracts, assistance agreements, indictments, judgment and conviction orders, plea agreements, and corporate information. Evidence may include documents containing individuals' Social Security Numbers. Computer generated records include data regarding categories and status of cases.

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

Access to CADS is limited to EPA staff supporting SDP. CADS is not integrated with other systems. Information about an external entities, whether it be a corporation or an individual, is stored in records in the system. Only individuals who have been suspended, proposed for debarment, or debarred from Federal procurement and assistance programs and individuals who have been the subject of agency inquiries to determine whether they should be debarred and/or suspended from Federal procurement and assistance programs are entered into the system.

EPA staff enter PII information about individuals with an open case into CADS. Such information includes, but is not limited to, names and addresses of individuals covered by the system of records, evidence obtained in support of Action Referral Memoranda and Case Closure Memoranda, interim decisions, compliance agreements, audits of compliance agreements, and final determinations. In addition, documents received from individuals, regarding an open case, that may contain sensitive PII information, such as an individual's SSN number, are uploaded into CADS. These documents include correspondence, inspection reports, memoranda of interviews, contracts, assistance agreements, indictments, judgment and conviction orders, plea agreements, and corporate information.

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?

CADS replaces OGD's Case Management System (CMS) as the case management system for SDP.

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

The data in CADS is used by SDP to pursue cases regarding the misconduct of federal funds related to environmental programs. The system stores case data and official documents throughout the entire lifecycle of a case, from opening to closing a case. The data in CADS is used to generate official documents that support SDP cases and to track the progress of a case.

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

CADS stores data associated with an open case that is generated/collected on an external entity. This information is crucial in providing decision makers with the appropriate amount of information necessary to render decisions on behalf of the Agency.

## **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?

CADS relies on EPA's Active Directory Services for user access to the system.

2. How often are passwords required to be changed?

CADS relies on EPA's Active Directory Services for user access to the system.

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)?

Only EPA staff that support SDP are granted access to CADS. The FAR clauses (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act) are including in the IT support contract for CADS.

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?

Training that addresses the misuse of PII data will be provided to staff before users are allowed access to CADS.

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 data stored in CADS is encrypted according to NIST requirements.

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*)

CADS is a standalone system and is not integrated with other EPA systems.

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.*)

CADS is an internal system that is only for EPA staff that support SDP.

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?

There are no plans to convert paper case materials in OGD's file room to electronic format to be stored in CADS.

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

There are no plans to share data in CADS 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*)

Case data stored in CADS enables EPA to pursue cases regarding the misconduct of federal funds concerning environmental programs. For instance, most phases in the case management lifecycle require that official documents be generated from data stored in CADS in order for a case to proceed from phase to phase. Official documents are developed, reviewed, and signed electronically within CADS.

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.)*

CADS allows EPA staff to retrieve case data on an individual based on personal identifiers, including name, address, email, and phone/fax number

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.)**

No risk analysis has been conducted to 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 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.)*

OGD has a link to EPA's Privacy and Security Notice website on its internet site that is available to external entities.

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

A link to EPA's Privacy and Security Notice website is accessible from both the OGD internet and intranet sites.

#### **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.)*

CADS is listed with records schedule 1016, which is a consolidated schedule that replaces the 601 records schedule.

<http://intranet.epa.gov/records/schedule/index.html>

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 requirements specification for CADS, entitled "CMS Detailed Requirements FINAL 062413.docx", specifies the details of the types of data collected by the system and where in the workflow process the user(s) assigned to a specific role(s) is able to add/update/review information in the system.

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.)*

EPA-33 Debarment and Suspension Files