

## PRIVACY IMPACT ASSESSMENT

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### Office of Environmental Information

System Name:		
Preparer:	Office:	
Date:	Phone:	
Reason for Submittal: New PIA _____ Revised PIA _____ Annual Review _____		
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 type="checkbox"/>	Termination/Decommissioned <input type="checkbox"/>	
<p><b>Note:</b> Existing Systems require an updated PIA when there is a <b><u>significant modification</u></b> or where changes have been made to the system that may create a new privacy risk. For a listing of <b><u>significant modifications</u></b>, see OMB Circular A-130, Appendix 1, Section (c) (1) (a-f) at <a href="http://www.whitehouse.gov/omb/circulars/a130/a130appendix_i.aspx">http://www.whitehouse.gov/omb/circulars/a130/a130appendix_i.aspx</a></p>		

### I. Data in the System

1. What data elements will be collected/contained in the system?
  
2. What are the sources (people/systems) and types (categories) of the data/information in the system?
  
3. Why is the information collected? (Purpose)
  
4. How is the information collected?
  
5. Is this a paper and/or electronic collection of data?

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

## 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?
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**)
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. How will you educate individuals/users having authorized access about the misuse of PII data? What type of training will users receive?
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)?
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\_\_\_. 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?

## 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\_\_\_ 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.*)

2. 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.)*
3. Where is the privacy policy (paper-form)/notice (electronic-webpage) posted?
4. Has a record control schedule been issued for the records in the system or the system itself? If so, provide the schedule number.
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?
6. Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain.
7. Does this system use any persistent tracking technologies?