

PRIVACY IMPACT ASSESSMENT

Please submit your responses to your Liaison Privacy Official

http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf.

If you need further assistance contact Marlyn Aguilar, at aguilar.marlyn@epa.gov or (202) 566-0012.

System Name: Integrated Grants Management System (IGMS)		
Preparer: Carlyn Perry	Office: OARM/OGD	
Date: 11/7/17	Phone: 202 564-5309	
Reason for Submittal: New PIA <input type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input checked="" type="checkbox"/> Rescindment <input type="checkbox"/>		
This system is in the following life cycle stage(s): Operations & Maintenance		
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>	Implementation <input checked="" type="checkbox"/>
Operation & Maintenance <input type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>		
<p>Note: Note: New and Existing Systems require a PIA annually, when there is a significant modification to the system or where privacy risk has increased to the system. For examples of significant modifications, see <u>OMB Circular A-130, Appendix 1, Section (c) (1) (a-f)</u>.</p> <p>The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <u>OMB Circular No. A-123, Section VII (A) (pgs. 44-45)</u>.</p>		

Provide a general description/overview of the system:

The Integrated Grants Management System processes the Agency Grants and Interagency Agreements. The Integrated Grants Management System (IGMS) contains information on the recipient of the grant, fellowship, cooperative agreement and interagency agreement, including the name of the entity accepting the award. This is usually an organization, with the exception of fellowships, which are awarded to persons, and interagency agreements which are awarded to other federal agencies.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the system in question?

Federal Grant and Cooperative Agreement Act, **31 U.S.C. 6301 et seq.**; Clean Air Act, **42 U.S.C. 1857 et seq.**; Federal Water Pollution Control Act, **33 U.S.C. 1254 et seq.**; Public Health Service Act, **42 U.S.C. 241 et seq.**; Solid Waste Disposal Act, **42 U.S.C.**

6901 *et seq.*; Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. 136 *et seq.*; Safe Drinking Water Act, 42 U.S.C. 300j-1; Toxic Substances Control Act, 15 U.S.C. 2609, Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9660.

- 1.2 Has a system security plan been completed for the information system(s) supporting the system? **Yes**
- 1.3 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix. **SF-424**

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

2.0 Identify the information the system collects, uses, disseminates, or maintains (e.g., data elements, including name, address, DOB, SSN).

Information collected includes: recipient name, recipient mailing address, recipient phone number, recipient email address and Dun and Bradstreet Number and tax identification number.

2.1 What are the sources of the information and how is the information collected for the system? **Information about recipients applying for Grants and Interagency Agreements. The information is collected electronically from the recipient. Lotus Notes ID information for EPA employees, is pulled from the Notes National Address Book to support integrated E-mail functions. Lotus Notes will be available until December 2018. Discussions are on-going at this time regarding phase-out of lotus notes**

2.2 Does the system use information from commercial sources or publicly available data? **No** If so, explain why and how this information is used.

2.3 Discuss how accuracy of the data is ensured.

Data from recipients is assumed to be accurate. EPA Grants Specialist and Project Officer verify the accuracy of the data.

2.4 **Privacy Impact Analysis: Related to Characterization of the Information**

Privacy Risk: Specific risks are inherent in the collection of the data elements from source systems.

Mitigation: The information collected supports the purpose of the Office of Grants Debarment Grants Program. The EPA Grants Office collects information that is directly relevant and necessary to accomplish this purpose.

Section 3.0 Uses of the Information

The following questions require a clear description of the system's use of information.

3.1 Describe how and why the system uses the information.

The EPA Office of Grants and Debarment uses information in the IGMS to Award Grants to the Recipient. Use of the mailing address and e-mail address information in IGMS is used to provide notification to recipients. This information is used to verify and validate information of recipients applying for Grants and Interagency Agreements.

3.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes ___ No X. 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. Or any identifier that can be linked or is linkable to an individual.)

Information in IGMS are assigned by grant number and identified by the grant number and recipient name. Data is retrieved by grant number and recipient name.

3.3 If the system retrieves information by personal identifier, what types/elements of information about the user are being retrieved?

IGMS can retrieve information by entity name, dun and bradstreet number. The entity information includes name, mailing address, email address and zip code.

3.4 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information? Privacy Act System of Records: Integrated Grants Management System Fellowship, EPA-53. <https://www.epa.gov/privacy/privacy-act-system-records-integrated-grants-management-system-fellowship-module-epa-53>

3.5 Does the system use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how EPA plans to use such results.

No

3.6 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that information collected and contained in IGMS could be misused.

Mitigation: To migrate any privacy risks with regards to use of information in IGMS.

Access to IGMS is limited to registered EPA users who have completed the Rules and Behavior, Project Officer and Grants training related to the user role and responsibility. Access is given after all training has been completed.

Section 4.0 Notice

The following questions seek information about the system's notice to the individual about the

information collected, the right to consent to uses of information, and the right to decline to provide information.

- 4.1 How does the system provide individuals notice prior to the collection of information? If notice is not provided, explain why not.**

The Office of Grants and Debarment post a Privacy Act Statement discussing the collection and use of information governed by the Privacy Act on EPA website.

- 4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the collection or sharing of their information? There is no public access**

- 4.3 Privacy Impact Analysis: Related to Notice**

Privacy Risk: There is no public access to IGMS

Mitigation: None

Section 5.0 Access and Data Retention by the system

The following questions are intended to outline the access controls for the system and how long the system retains the information after the initial collection.

- 5.1 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, each user in IGMS is designated a user role within the system based on their access and assigned role.**

- 5.2 Are there other components with assigned roles and responsibilities within the system? No, assigned roles and responsibilities with IGMS are provided only to registered IGMS EPA personnel. There are no other components within IGMS with assigned roles and responsibilities.**

- 5.3 Who 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)? 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)? Science Application International Corporation (SAIC) contractors have an Agency level contract being redone and will include the clause above.**

- 5.4 What procedures are in place to determine which users may access the information and how does the system determine who has access?**

IGMS is managed by a system administrator in the Office of Grants and Debarment who assigns roles and responsibility with the system to registered IGMS users. The roles are determined by the mandatory training related to the roles and responsibility of the user. User access is based on roles user are assigned in the system.

- 5.5 Explain how long and for what reason the information is retained. Does the system have an EPA Records Control Schedule? If so, provide the schedule number.**

Records are retained in accordance with EPA's Record Schedule 009 and disposed of under National Archives and Records Administration (NARA) disposal authority NARA Disposal Authority: N1-412-07-33c.

Item c: Electronic data - Superfund site-specific

This item is to be used only by the Office of Administration and Resources Management, Grants Management Division at Headquarters. NARA Disposal Authority: N1-412-07-33c; Disposable; Destroy 30 years after grant closeout.

Item d: Electronic data - waste water construction and state revolving fund grants

This item is to be used only by the Office of Administration and Resources Management, Grants Management Division at Headquarters.

NARA Disposal Authority: N1-412-07-33d; Disposable

Destroy 20 years after grant closeout.

Item e: Electronic data - other than Superfund site-specific, waste water construction, and state revolving fund grants

This item is to be used only by the Office of Administration and Resources Management, Grants Management Division at Headquarters. NARA Disposal Authority: NARA Disposal Authority: N1-412-07-33e; Disposable; Destroy 10 years after grant closeout.

5.6 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Yes

5.7 Privacy Impact Analysis: Related to Retention

Privacy Risk: The longer information is retained, the longer the information must be secured.

Mitigation: The record retention schedule is applicable to IGMS and the Privacy Act to keep the minimum amount of PII for the minimum amount of time, while meeting the Federal Records Act.

Section 6.0 Information Sharing

The following questions are intended to describe the scope of the system information sharing external to the Agency. External sharing encompasses sharing with other federal, state and local government, and third-party private sector entities.

6.1 Is information shared outside of EPA as part of the normal agency operations? If so, identify the organization(s), how the information is accessed and how it is to be used, and any agreements that apply. There is a MOU with Grants.gov to connect to OEI CDX to provide grants information to IGMS.

6.2 Describe how the external sharing noted in 6.1 is compatible with the original purposes of collection in the SORN noted in 3.4. There is system to system access. There is no public access.

6.3 Does the agreement place limitations on re-dissemination? Yes

6.4 Describe how the system maintains a record of any disclosures outside of the Agency. There is no public access. No agreements apply.

- 6.5 How does the system review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within EPA and outside? **We work with each office to establish a MOU for internal EPA offices.**
- 6.6 **Privacy Impact Analysis: Related to Information Sharing**

Privacy Risk: Information sharing agreements, MOUs, pertaining the information, or new access to the system by organization within EPA and outside would be subject to review and approval by the OARM Primary Information Security and OARM Senior Information Official.

Mitigation: Information is shared within the Agency for purposes of grants review on as need to know bases.

Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

- 7.1 What are the procedures that allow individuals to access their information?
There is no public access.
- 7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information? **There is no public access.**
- 7.3 How does the system notify individuals about the procedures for correcting their information? **There is no public access.**
- 7.4 **Privacy Impact Analysis:** Related to Redress

Mitigation: There is no public access.

Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy based safeguards and security measures.

- 8.1 How does the system ensure that the information is used in accordance with stated practices in this PIA?
IGMS maintains an audit trail documenting the actions that users take in the systems. IGMS is limited to registered EPA employees with assigned roles and responsibilities.
- 8.2 Describe what privacy training is provided to users either generally or specifically relevant to the system/collection.
The Information Security Awareness Training is required each year. The course

includes information regarding policies and practices that EPA users should follow. The Privacy Act of 1974 and Rules of Behaviors are also discussed.

8.3 **Privacy Impact Analysis**: Related to Auditing and Accountability

Privacy Risk: If a system does not have technical controls and policy based on safeguarding security measure that can be audited. Not ensuring users are being held accountable for compliance with policy regarding access to a system may present a risk.

Mitigation:

IGMS includes access controls and an audit trail for grant information. Users of the system must take the Rules of Behavior yearly to maintain access to the system.