

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: Office of Multimedia		
Preparer: Anthony Singleton	Office: Office of Multimedia	
Date: February 16, 2018	Phone: 202-564-2293	
Reason for Submittal: New PIA_____ Revised PIA_____ Annual Review_X_____		
This system 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"/> 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 Office of Multimedia (OM) is the full-service multimedia production unit at EPA. Through video, webcasts, photography, audio and graphics, OM keeps EPA staff and the general public informed and up to date on the latest agency activities and messages.

All multimedia produced in EPA’s video studios (Studio One) are captured or created, edited, encoded, and broadcast for public distribution. OM keeps a database of all captured or created media in house for a period of one year, after which the content is sent to the National Archives for permanent storage per EPA and NARA records-keeping regulations.

OM operates in a mixed hardware/software environment with Apple Macintosh systems as primary on mobile, independent, and physically networked subsystems. Studio One’s video broadcast switcher runs an integrated version of Windows 7. Four (4) EPA-issued laptops remain current via OEI’s lifecycle planning. Two video producers, two vacant video production positions, one engineer, and one photographer all run Apple iMacs, and one ORISE fellow runs an Apple MacBook Pro laptop, that are independent from the

EPA LAN on authorized wireless hotspots. Studio One’s broadcast switcher, Tricaster 8000, EPA-issued laptops, one graphic artist iMac, and three iMac editing stations run networked to the EPA LAN via Pagedge SX-24P16 broadcast quality network switch. Other networked devices include four Panasonic AW-HE130KP PTZ camera systems, one Panasonic remote camera control system, three Aja Kumo video X-Y switching systems, and a single Shuttle XPC encoder running Windows 7.

Cybersecurity implementation is designed understanding that EPA OEI has established defense in depth. OM has implemented the use of ESET endpoint protection advanced on the Mac systems separate from EPA OEI Symantec Solutions due to the nature of the office. This software package will provide OM ISSO the ability to utilize endpoint protection via Host Intrusion Prevention System (HIPS), Antivirus, Virtual Firewall, and Data Access Control (DAC).

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?

In accordance with OMB Circular No. A-123, Section VII(A) and 44 U.S.C. § 3501 note. Section 208(b); OM system is designed not to collect any PII of any type. All multimedia content generated by OM is in the public-domain and falls under “fair use.”

1.2 Has a system security plan been completed for the information system(s) supporting the system?

Yes, File “OM SSP 04272016(00000003).doc may be found in Xacta’s Artifact Library.

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.

The Office of Multimedia does not interview more than 10 people for any content. An ICR is not required for our work.

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.

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

The system collects raw analog or digital video / audio from various camera / microphone input devices for record with digital based recording devices. Digital photography is also taken for record. This data is then manipulated for story telling or

information distribution purposes. The final dissemination of the product will be used to transmit the intent of the EPA to the public and EPA employees on behalf of the office of the Administrator. The format of the product could take the form of any or all of the following: video / audio broadcasting via webcasting, closed circuit television, live broadcast television, press announcements, public educational films, or internal EPA training media. All multimedia content generated by OM is in the public-domain and falls under “fair use.”

2.2 What are the sources of the information and how is the information collected for the system?

The source of the information is dependent upon the formal request of the internal EPA office or external element that has requested the services of OM. The content is dependent on the type of multimedia service that is needed, for example: B-roll video footage, radio or video interviews, live footage, educational films, training videos, webcasting, web meeting, photographs, graphics, podcasting, etc.

2.3 Does the system use information from commercial sources or publicly available data? If so, explain why and how this information is used.

In the course of content creation, OM sometimes relies on commercially available materials like stock footage, stock music, stock imagery, etc. that is obtained through a procurement agreement with each source. Non-public information obtained from specific individuals or entities (stakeholders) is used only with express permission from the copyright owner through an EPA consent form. This material is stored only for use in the multimedia content under production and does not transfer to the National Archives as they are not official EPA records and the copyright remains with the source of the material.

2.4 Discuss how accuracy of the data is ensured.

The data is to be retained on an off-network intranet that resides only within OM. Reliance of data accuracy is high as only assigned/authorized personnel will have access to this data.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: All OM-generated content is in the public-domain and falls under “fair use.” The system collects raw digital video / audio from various camera / microphone input devices using digital-based recording devices. Digital photography is also taken for record. This data is then produced into multimedia content, to include public service announcements, feature stories, infographics, photo slideshows, audio podcasts, etc., to disseminate agency messages to EPA employees, stakeholders and the public. The format of

the product can also take one or more of the following forms: video / audio broadcasting via webcasting, closed circuit television, live broadcast television, press announcements, public educational films, or internal EPA training media. As such OM does not remediate the data in any way. At the time of recording one-on-one content with individuals, OM obtains signed consent from the subject using documentation reviewed and approved by the Office of General Counsel to use their likeness. Any media procured from an individual or entity for use in an EPA multimedia product, example photos, video clips, etc., is also obtained using a signed authorization form, also approved by the Office of General Counsel, granting the agency permission to use the material in specific products.

Mitigation:

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 use of the data acquired is to inform EPA employees, stakeholders and the public about the agency's mission and priorities via audiovisual methodologies in order to produce educational, training, public information, interviews, and specialty features.

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 is retrieved by date/time of event; program or subject content; and program office.

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

N/A

3.4 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

N/A

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.

OM technology is capable of conducting this type of work, but is not configured to operate in said manner without modification.

3.6 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: The use of the data acquired is to inform EPA employees, stakeholders and the public about the agency’s mission and priorities via audiovisual methodologies in order to produce educational, training, public information, interviews, and specialty features. All OM content is in the public domain and considered “fair use.” OM does not collect nor do any of our systems input and store any PII data.

Mitigation: N/A

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.

All OM-generated content is in the public-domain and falls under “fair use.” At the time of recording one-on-one content with individuals, OM obtains signed consent from the subject using documentation reviewed and approved by the Office of General Counsel to use their likeness. OM’s system does not provide further notice than mentioned above. During public hearings and agency events, notification to the public and EPA employees is provided by agency public affairs officials in the form of Mass Mailers, public notices, announcements prior to the start of a public and recorded event, and email invitations to guest speakers. N/A

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?

All OM-generated content is in the public-domain and falls under “fair use.”

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4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: All OM-generated content is in the public-domain and falls under “fair use.” At the time of recording one-on-one content with individuals, OM obtains signed consent from the subject using documentation reviewed and approved by the Office of General Counsel to use their likeness – the purposes of the project and stated uses are described in the consent form. OM’s system does not provide further notice than mentioned above. During public hearings and agency events, notification to the public and EPA employees is provided by agency public affairs officials in the form of Mass Mailers, public notices, announcements prior to the start of a public and recorded event, and email invitations to guest speakers. If individuals choose to opt out of the recording, OM does not capture them on any device.

Mitigation: N / A

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?

OM intranet equipment will not have access control levels installed beyond two factor authentication due to the operational requirement of multimedia transfers and editing software needing full administrator access for proper use, as well as multimedia production requirements in support of the agency. All personnel will have the ability to have access to the data stores with the Chief Engineer as the systems administrator.

EPA OEI-owned equipment will follow normal prescribed controls based upon OEI policies and practices.

OM network attached equipment will have a To Be Determined (TBD) set of controls to assist in the mediation of security concerns discovered in the Authorization to Operate

(ATO) evaluation. Note: current control set has been outmoded due to lifecycle rotation of most of OM equipment and software.

5.2 Are there other components with assigned roles and responsibilities within the system?

None

5.3 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)?

Only OM government-employed personnel will have explicit access to data.

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

OM intranet (off network) equipment will physically reside behind a locked sub-office, of a locked main office (outside of normal business hours, spaces are secured by EPA physical security that requires authentication badges to have access to the building).

OM internet connected equipment will be secured by OEI authentication policies and practices.

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.

Record schedule class 722 has been established. OM maintains digital signatures, audit, network traffic logs, system logs, and non-final product, video footage, audio/photo/graphics files for one year. Completed products and raw OM-captured content is shipped to the National Archives for historical preservation, which is researchable by obtaining a FOIA request or contacting NARA directly.

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

Yes. OM follows procedures established between EPA and NARA. OM coordinates with the EPA records office (POC: Barbara Felton) for transfer of records based on established

protocols.

5.7 Privacy Impact Analysis: Related to Retention

Privacy Risk: OM maintenance of digital signatures, audit, network traffic logs, system logs, and non-final product, video footage, audio/photo/graphics files for a storage period of one year is secured physically behind a keyed main door and a crypto key access door. The data store is further secured by maintaining an off-network enclave for the primary database, and relying upon EPA's established network designed defense in-depth schema for protection. OM content is stored for a period of one year then transferred to the National Archives for historical preservation.

Mitigation: N/A

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.

Yes, information is created to be shared outside of EPA as part of normal agency operations through the Office of Public Affairs. All OM-captured and generated content is considered "fair use" and readily available to the public upon request. The data is public information and available to other agencies, state, and local governments, and the general public through the EPA website, news sites, social media channels and web-based hosts, or through a FOIA (Freedom of Information Act) request. Other agencies, state, or local governments do not have direct access to the system.

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.

N/A

6.3 Does the agreement place limitations on re-dissemination?

All OM-captured and generated content is considered "fair use" and readily available to the public upon request.

6.4 Describe how the system maintains a record of any disclosures outside of the Agency.

All OM-captured and generated content is considered “fair use” and readily available to the public upon request. All requests for content must be made through the Office of Media Relations. Once the records are transferred to the National Archives, NARA maintains all records.

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?

OM system does not conduct any information sharing beyond a formal FOIA request. No PII is stored thus cannot be shared at any time.

6.6 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk All OM-captured and generated content is considered “fair use” and readily available to the public upon request. All OM-generated content is transferred to the National Archives for historic preservation and is readily available upon request by any individual or entity. Privacy risk is at the lowest level and does not need to be remediated.

Mitigation: N/A

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?

OM systems do not maintain any PII for individuals to access.

Individuals will be granted access to their information via dual factor authentication. No other requirements needed.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Individuals will have machine level administrative rights and privileges in order to conduct normal audio / video production work. This authority will be used to correct any inaccurate or erroneous information.

7.3 How does the system notify individuals about the procedures for correcting their information?

The System will not notify individuals about procedures for correcting their information.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is no redress program that OM provides beyond the expected access and corrections under the Privacy Act and FOIA. All OM-generated content is in the public domain and considered “fair use” and is provided upon request by individuals or entities.

Mitigation: N/A

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?

OM system is not configured to enforce policies listed in the PIA. Enforcement will be conducted by the ISSO, SO, and Chief Engineer.

8.2 Describe what privacy training is provided to users either generally or specifically relevant to the system/collection.

OM will enforce EPA general information network security training.

8.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk: N/A

Mitigation: N/A