

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: Pesticide Environmental Stewardship Program Membership Platform (Salesforce)

Preparer: Raderrio Wilkins **Office:** OCSPP/OPP/BPPD

Date: 12/06/2017 **Phone:** 703-308-1259

Reason for Submittal: New PIA ☒ Revised PIA ☐ Annual Review ☐ Rescindment ☐

This system is in the following life cycle stage(s):

Definition ☐ Development/Acquisition ☐ Implementation ☐

Operation & Maintenance ☒ Rescindment/Decommissioned ☐

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 OMB Circular A-130, Appendix 1, Section (c) (1) (a-f).

The PIA must describe the risk associated with that action. For assistance in applying privacy risk see OMB Circular No. A-123, Section VII (A) (pgs. 44-45).

Provide a general description/overview and purpose of the system:

Salesforce is cloud-based Customer Relationship Management platform used by the Pesticide Environmental Stewardship Program (PESP) and managed by the Office of Pesticide Programs, to market EPA's voluntary partnership program to the nation's pesticide-user community, collect pesticide use and training data on member's Integrated Pest Management measures to reduce human health and environmental risks associated with pests and pesticides and to assess their progress and retention.

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?

- Sections 2(b), 3(b) and 4(b) of the Pollution Prevention Act of 1990, 42 U.S.C. 13101(b)
- Section 3 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

- Food Quality Protection Act of 1996 (7 USC 136r-1)

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

OPP's Information Technology and Resource Management Division executes and manages all of the Office's system security plans. To our knowledge there is currently no System Security Plan (SSP) covering PESP however, there is a Salesforce SSP/ATO out of OPP that is used for other applications and can be used for PESP. The use of OPP's ATO Salesforce System Security Plan is contingent on the approval of PESP's Privacy Impact Assessment Form.

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.

- OMB Control No: 2070-0188
- PESP Membership Application Form – EPA Form 9600-02
- PESP Strategy/ Progress Reporting Form for Residential/ Commercial Pest Control Providers Members – EPA Form 9600-03
- PESP Strategy/ Progress Reporting Form for All Members that are Not Residential / Commercial Pest Control Services Providers - EPA Form 9600-01

The forms are available here:

https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=201611-2070-002

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 and maintains the company name, mailing address, industry type, business telephone number, name and title of primary and secondary company contact person, email address and telephone number of primary and secondary contact person, Organizational Profile Measures and IPM Implementation and Adoption Progress Data (IPM Practices, pesticide risk reduction and usage, economic benefits, and IPM/Education and Promotion). The information collected by the system is restricted to the company/organizational level. No PII is used as an identifier.

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

Prospective applicants and PESP members submit electronic forms (PESP Membership Application and/or Strategy/Reporting forms) expressing a desire to join the program and to document their IPM progress and commitment. EPA staff would enter the company's

submitted information (assessments, correspondences, and other documentation) into Salesforce.

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

No. Information is voluntarily submitted electronically by PESP member representatives to the PESP Salesforce account via OPP's Data Exchange.

2.4 Discuss how accuracy of the data is ensured.

Participating PESP members are audited by an approved, third party certifying company.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Discuss the privacy risks identified for the specific data elements and for each risk explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

N/A

Privacy Risk:

None

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 information collected will allow OPP to leverage the data and technology to achieve the following key goals and/or support:

- Provide OPP with data on Integrated Pest Management tactics and pesticide usage in a variety of agricultural and residential settings.
- Demonstrate the economic benefits related to IPM adoption and implementation.
- Reduce the burden on PESP members who are promoting IPM to other pesticide users and collecting pesticide usage data for their industries.
- Provide PESP member organizations and the program's stakeholders with data on effective IPM techniques to combat pesticide resistance, emerging pest issues and invasive species.
- Promote and track EPA's contributions to partnerships in key federal initiatives.

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

Section 4.0 Notice

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Mitigation:

There are no privacy risks as all results are compiled and only shared in aggregate with no organizational identifiers.

Privacy Risk:

Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above.

3.6 Privacy Impact Analysis: Related to the Uses of Information

Yes. The system allows for a small number (currently 3) of EPA staff to perform electronic searches on key words and summarizes membership by sector. The Salesforce system can also summarize member reports of IPM tactics and pesticide usage. EPA plans to use the data, in aggregate, to show membership trends over time (increasing/decreasing), membership segmentation by sector, areas under IPM programs, IPM outreach mechanisms being used by members, and general pesticide usage information by member organization. The information is not directly available to anyone outside of the small number of OPP/BPPD staff who use it to prepare aggregate reports.

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 SORN needed.

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

None.

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

The system allows users (EPA staff) to retrieve information by PESF member (organization) name. The PII of the members' primary and secondary contacts are not used to retrieve member information.

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.)

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.

Currently, there is no explicit notification to applicants that the information they submit is being collected. It is inherently understood by applicants that since they are applying for membership in a partnership program, information they submit will be collected as part of their participation. In the future, OPP/BPPD will add an electronic notice to the membership application form and annual IPM Strategy/Progress Reports informing applicants/members that the information they submit is being collected and will be used, in aggregate, for reporting purposes and to contact them directly with program participation information. Membership commitments are tailored to reflect this with commitment details for these two sectors outlined in the Member Handbook. PESP requires that its members make commitments in four areas:

- Performance.
- Participation.
- Responsibility.
- Education.

PESP membership is open to companies and organizations that:

- Use pesticides
- Represent pesticide users
- Implement or influence pest management practices of pesticide users

Companies that primarily manufacture or market pest control chemicals or products are generally not eligible for membership. If a member opt-out of providing the required IPM information they cannot participate in PESP. Although PESP members represent diverse segments of the pesticide-user community, they often share common pesticide challenges. PESP membership is divided into four groups of members who share common pesticide interests, such as community IPM and sustainable agriculture.

A sample of IPM-related measures members are required to submit to EPA can be found on our PESP website (Membership Eligibility and Performance Measures): <https://www.epa.gov/pesp/membership-eligibility-and-performance-measures-pesp>

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?

Applicants and member organizations must currently consent to the collection and sharing, in aggregate only, of their information. If an applicant or member wishes to opt out of EPA collecting their organizational contact and reporting information, they would be deemed to have withdrawn from the program, as this information is required for participation.

4.3 Privacy Impact Analysis: Related to Notice

Discuss how the notice provided corresponds to the purpose of the project and the stated uses. Discuss how the notice given for the initial collection is consistent with the stated use(s) of the information. Describe how the project has mitigated the risks associated with potentially insufficient notice and opportunity to decline or consent.

Privacy Risk:

None

Mitigation:

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? Yes.

5.2 If so, what control levels have been put in place? If no controls are in place why have they been omitted? Role-based access is defined for each user (currently 3 users).

5.3 Are there other components with assigned roles and responsibilities within the system? No

5.4 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 EPA (OPP/BPPD) staff that are FIFRA CBI cleared have access to the data in the system.

5.5 What procedures are in place to determine which users may access the information and how does the system determine who has access?
The OPP/BPPD Branch Chief that supervise operations of the Pesticide Environmental Stewardship Program serves as the system administrator and defines the role/access level for each staffer with access to the system.

5.6 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.

Participant/member contact information is retained until the member terminate their participation in the program or until a particular contact is replaced by another individual. Members' IPM strategy/reporting information is retained until the member organization terminates their participation in the voluntary program.

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

Yes, NARA 0090- Administrative Support (Voluntary Programs).

5.8 Privacy Impact Analysis: Related to Retention

Discuss the risks associated with the length of time data is retained. How were those risks mitigated? The schedule should align with the stated purpose and mission of the system.

Data is retained for the length of time member organizations remain in the partnership program. When they withdraw from the program, their information is deleted. Only a small number (currently 3) EPA staff have access to these data.

Privacy Risk:

The length of time the member organizations remain in the voluntary partnership program would equal the length of time we would have to protect the organization's information. There is no records control schedule number that specifically identifies PESP and the software Salesforce that we use to manage and collect members IPM activities. However, until a special category can be created, PESP's activities and records management would fall under EPA's Record Control Scheduler 0090- Administrative Support Databases (Voluntary Programs) and 1012e – electronic software.

Mitigation:

We are currently working with Earl Ingram and Barbara Felton to explore if an additional category is needed.

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, aggregated from member submissions, is shared through EPA-produced reports and articles with PESP members and stakeholders. Information shared would include program participation (number of members), membership by sector, and information on pest management tactics and IPM outreach being conducted by members.

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.

The collected aggregated IPM data is used to develop pesticide usage reports and IPM adoption strategy presentations for senior management (Division Directors, Office Directors and Assistant Administrator) to share with other federal agencies and pesticide stakeholders.

6.3 Does the agreement place limitations on re-dissemination? No.

6.4 Describe how the system maintains a record of any disclosures outside of the Agency.
Information from this system is only shared outside of the Agency through Agency-developed presentations and aggregate reports. The system is the repository for the IPM data which must be manually extracted to develop other specific reports. Furthermore, the system maintains a record of every authorized user activity. The system does not create or maintain a record of any disclosures outside of the Agency.

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?
System access is limited to a small number of EPA (OPP/BPPD) staff. External access is not permitted.

6.6 Privacy Impact Analysis: Related to Information Sharing
Discuss the privacy risks associated with the sharing of information outside of the agency. How were those risks mitigated?

Privacy Risk:

None

Mitigation:

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 are no procedures in place to allow individuals to access their information. System access is limited to a small number of EPA (OPP/BPPD) staff. External access is not permitted.

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

PESP member organizations must contact EPA (OPP/BPPD) staff to correct inaccurate information.

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

The system does not notify member representatives about procedures for correcting their information. In the program's membership handbook, EPA provides guidance for contacting program representatives if there are issues that require resolution. EPA provides members with an email box and toll-free phone line for contacting program representatives.

7.4 Privacy Impact Analysis: Related to Redress

Discuss what, if any, redress program the project provides beyond the access and correction afforded under the Privacy Act and FOIA. N/A

Privacy Risk:

None

Mitigation:

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?

EPA staff monitor system access to insure only the small number (currently 3) of OPP/BPPD staff are the only persons accessing the system. Chain of command reporting insures that any reports generated from the system are aggregated and division management reviews all presentations, reports, or articles that contain aggregate information from the system.

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

All system users maintain FIFRA CBI clearances, undergo annual EPA required IT security training, and adhere to other standard Agency training requirements. System users do not receive privacy training specific to the PESF Salesforce account.

8.3 Privacy Impact Analysis: Related to Auditing and Accountability

N/A

Privacy Risk:

None

Mitigation: