EPA United States
Environmental Protection
Agency

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: ORD Management Information System (OMIS)

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Date: 11/7/2017	**Phone: 513-569-7759**

Reason for Submittal: New PIA_____   Revised PIA_X__   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:

OMIS tracks a wide variety of data, which provides ORD with the administrative tool to support the EPA's environmental mission:

- Budgets and expenses
- Research tasks and outputs
- Extramural vehicles
- Human resources
- Procurement of capital equipment
- Building and facilities construction and maintenance

The records that are relevant to the Privacy Act are those describing personnel and their payroll, special pay, personnel actions, and training. These records contain employee details such as name, workforce employee ID, employee type, appointment type, organization, office location, office phone number, office e-mail address, and employer. They may include an emergency contact person and phone number. For Federal and PHSCO employees, the data may include date of birth, job series and title, grade and step, salary, pay plan, retirement type, service computational date, separation date, number of hours worked (actual and projected), overtime, pay amounts (actual and projected), personnel actions, awards, highest educational degree, adjunct professorships, and training courses taken. There are also flags to indicate those Federal employees who are Supervisors, Principal Investigators, Extramural Managers,

those who have gone through the Technical Qualifications Board (TQB), and those on the Health & Safety Medical Monitoring Program.

Categories of persons being covered in OMIS are any employee currently or formerly working on the premises of an ORD facility, whether full-time or part-time, such as: Current and former EPA employees; Public Health Service Commissioned Officers (PHSCO) assigned to EPA; employees of other Agencies assigned to EPA under an Interagency Agreement (IGA) or Intergovernmental Personnel Act (IPA); onsite ORD contractors; post-doctorial, pre-doctorial, and summer students; holders of fellowships and internships, NRC research associates, and visiting scientists; students participating in programs such as Student Volunteers, Student Career Experience Program, Student Services Contract Authority, and the McNair Scholar Program; term appointments, temporary hires, and those employed under the Senior Environmental Enrollee Program.

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?

The HR data in OMIS originates in the Agency People Plus System. ORD-related data is received from People Plus.

There is an ISA/MOU in place for Compass Data Warehouse.

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

ORD is not responsible for the supporting system of OMIS. The agency is responsible for the security plan for Compass Data Warehouse and People Plus.

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.

Not applicable.

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).

Home Telephone Number and Date of Birth are no longer collected. This data for ORD employees is no longer updated as of 2015. Data is not current. The original data was

pulled down from the agency HR system. Our task list contains removing the DoB and Home Telephone Number items present in the database.

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

Data is downloaded from People Plus and Compass Data Warehouse

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

2.4   Discuss how accuracy of the data is ensured.

People Plus and Compass Data Warehouse ensure accuracy of data.

2.5   <u>Privacy Impact Analysis</u>: 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.

<u>Privacy Risk</u>:

The information in OMIS is available on a need to know basis within ORD only.

<u>Mitigation</u>:

Annual OMIS Security Assessment.

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.

OMIS tracks a wide variety of data, which provides ORD with the administrative tool to support the EPA's environmental mission:

- Budgets and expenses
- Research tasks and outputs
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3.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes_X__ 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. Or any identifier that can be linked or is linkable to an individual.)*

Employee ID.

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

Some PII as referenced in 2.1.

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

Do not have a SORN for OMIS. Rely on applicable SORNs for People Plus and Compass Data Warehouse.

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.

Data integrity is constantly checked and maintained.

3.6   Privacy Impact Analysis: Related to the Uses of Information

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

Privacy Risk:

The information in OMIS is available on a need to know basis within ORD only.

Mitigation:

Annual OMIS Security Assessment.

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.

No notice is given by OMIS. Data is downloaded from People Plus and Compass Data Warehouse.

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?

No opportunity is given by OMIS. Data is downloaded from People Plus and Compass Data Warehouse.

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:

Not applicable No notice given

Mitigation:

Not applicable

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. Users are only able to see data base on a need to know basis per job responsibilities.

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

No.

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)?**

EPA ORD personnel and EPA ORD contractors. Only people in these two groups that need the information have access to it.

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

A user's manager must sign off on a new account based on a need to know and the Business Owner in the Lab, Center, or Office must approve.

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.

OMIS does not have an archive process. The Records Control Schedule is 0467.

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

Will confirm with ORD Records Liaison Officer.

5.7   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.

<u>**Privacy Risk**</u>:

No data has been archived.

<u>**Mitigation**</u>:

No data has been archived.

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.
NO

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.
Not applicable.

6.3   Does the agreement place limitations on re-dissemination?
Not applicable.

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

Not applicable.

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?**

Not applicable for external agency sharing. OMIS has an internal MOU/ISA with Office of Chief Financial Officer (OCFO) for Compass Data Warehouse.

6.6 **Privacy Impact Analysis: Related to Information Sharing**

Discuss the privacy risks associated with the sharing of information outside of the Department. How were those risks mitigated?

Privacy Risk:

Not applicable.

Mitigation:

Not applicable.

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?**

Not applicable. Access to OMIS is based on a need to know basis.

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

Not applicable. Access to OMIS is based on a need to know basis.

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

Not applicable. Access to OMIS is based on a need to know basis.

7.4 <u>Privacy Impact Analysis</u>: Related to Redress

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

<u>Privacy Risk</u>:

Not applicable.

<u>Mitigation</u>:

Not applicable.

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?

OMIS is assessed annually and modified for compliance with Agency and National Institute Standard Technology (NIST) security assessment standards.

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

OMIS users are covered under the annual agency security and privacy training.

8.3 <u>Privacy Impact Analysis</u>: Related to Auditing and Accountability

<u>Privacy Risk</u>:

Low.

<u>Mitigation</u>:

OMIS Compliance with annual NIST security assessment and annual privacy and security training for all users.