



## PRIVACY IMPACT ASSESSMENT

Please submit your responses to your Liaison Privacy Official  
[http://intranet.epa.gov/privacy/pdf/lpo\\_roster.pdf](http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf).

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

### Office of Public Affairs Email Outreach

System Name (Current Systems in Use): **Campaign Monitor**

Preparer:  
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Office:  
Office of Public Affairs  
Office of Web Communications

Date: Phone: 202-564-0446

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:

The Office of Public Affairs uses third party email marketing tools to disseminate information to the press, stakeholders, and the public. We use these systems to send out press releases, media advisories, and newsletters to individuals interested in receiving this information via email. The system we currently use is Campaign Monitor.

### Section 1.0 Authorities and Other Requirements

Commented [EJ1]: Move to previous line.

Deleted: ¶

Commented [EJ2]: How many systems do you have that perform the same functions/purpose/use?

Also, how are the individual chosen to receive the newsletters?

How do they provide consent to the collection, use, and sharing?

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

5 U.S.C. 301

Commented [EJ3]: Need a statutory authority. This is not complete.

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

No

Commented [EJ4]: Why is there no security plan?

**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.**

No, information collected is not covered under the PRA.

**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 information collected on Campaign Monitor includes EPA employee name and email address for account access purposes and names and email addresses of individuals who opt-in to receive EPA publications that the Agency uses these systems to distribute. The system also saves the topics of news releases and newsletters each individual subscribes to.

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

Members of the press and subscribers provide the information when they sign up to receive press releases, media advisories, and/or newsletters from EPA via email.

**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, Campaign Monitor does not use information from commercial sources or publicly available data.

**2.4 Discuss how accuracy of the data is ensured.**

The information is provided by the subscribers. Campaign Monitor automatically “de-

duplicates: to assure that multiple emails are not sent to the same address. In addition, the system automatically removes invalid email addresses from the system.

Commented [EJ5]: How is this done?

Commented [EJ6]: How does the system know how to remove someone (unsubscribe)?

## 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.*

### **Privacy Risk:**

The risk is minimal. The data collected and stored by this system are only names and email addresses. No additional data or information is stored.

### **Mitigation:**

No additional information is requested or stored.

## 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.**

Campaign Monitor stores first name, last name, and email of journalists and the public. The information stored about journalists is used to build better and more targeted media campaigns, influence messaging and monitor/measure newsworthy events and media coverage trends concerning the EPA or topics relevant to the EPA. The information stored about the public is used to send press releases and newsletters to individuals that opt-in to subscribe to receive them.

### 3.2 **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. Or any identifier that can be linked or is linkable to an individual.)**

Commented [EJ7]: If this is correct, how do you send out press releases?

Are the emails sent to individuals, group mailboxes, medias, etc.?

No, Campaign Monitor does not have this type of feature.

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

No, Campaign Monitor does not retrieve by personal identifier.

**Commented [EJ8]:** Check response based on 3.2.

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

No.

**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**

*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:**

There is minimal risk that the information stored by these systems on behalf of EPA will be misused or improperly handled.

**Mitigation:**

The contact information is only used to send out press releases and targeted media.

**Commented [EJ9]:** This appear to be the answer for 3.2.  
This appears to be the method of retrieval.  
Please confirm.

**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 individual media contacts listed in Campaign Monitor and all members of the public who subscribe can opt out to future emails at any time.

**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 individual media and all members of the public who subscribe can opt out to future emails at any time. Information is not shared outside of the agency.

**Commented [EJ10]:** Not sure about this response. When mailing out the newsletters, are they sent individually or as a group?

**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:**

When subscribing to receive EPA emails, the public may select which topics they would like to receive, are informed about EPA subscriptions, and are informed about EPA’s privacy policy. In addition, every email sent out gives the receiver the option to opt out of future emails.

**Mitigation:**

None. Subscribers decide what topics they would like to receive updates.

**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?**

Administrators and EPA staff have access to Campaign Monitor send out emails, newsletters, and press releases. Access control is in place for functionality and data access. Application access control allows/disallows certain functionality.

**Commented [EJ11]:** Need more. Did not respond to question.

**5.2 Are there other components with assigned roles and responsibilities within**

the system?

OPA staff who send out news releases and other outreach emails via Campaign Monitor have access to the system.

**Commented [EJ12]:** Is this different than the newsletters and news releases, press releases, and media advisories?

**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)?**

Data in Campaign Monitor consists the names and email addresses of users who have opted in to receive EPA newsletters are stored in the system. No EPA employee data will be stored, other than a username and company email address. Only EPA employees and system provider administrators have access to the systems.

**Commented [EJ13]:** How was the opt in provided?  
How did they originally agree to accept the information?

**Commented [EJ14]:** Are any of these individual's contractors?

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

In Campaign Monitor, the EPA users, determined by the Office of Public Affairs, have access to information as deemed appropriate by EPA administrators through role creation and assignment features within the platform. System support staff have access to information to aid in troubleshooting. System operations staff have access to perform necessary maintenance and support.

**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.**

Information, like subscriber lists, are maintained on Campaign Monitor as long as there are needed.

**Commented [EJ15]:** Are these shared?  
Do the individuals know they are on a list?  
Is the information collected captured in Section 2.1.

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

Most of the data collected and maintained by these systems are not records. If data is determined to be a record, the record copy will be maintained under EPA Records Schedule Number 1022.

**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.*

**Privacy Risk:**

The risk that this data will be inappropriately accessed or retained is minimal.

**Mitigation:**

None.

**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, the only individuals with access to information on Campaign Monitor are EPA employees and system administrators who support EPA's contract.

**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?**

N/A

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

N/A

**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?**

N/A

## **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:**

None

## **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?**

On Campaign Monitor, the only thing that is unique to the individual EPA employee, is their username and password, which can be changed by the user from the platform. Physical access to systems are guarded and only pre-authorized system administrators and support personnel can access them. The access is monitored and recorded.

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

Campaign Monitor includes the ability to store contact information of subscribers, including the ability to add media contact or a private individual data. EPA uses this feature to store names and emails of individuals who opt in to receive email newsletters from the Agency. Individuals who want to change their subscription information need to unsubscribe and then subscribe again with the updated information.

**Commented [EJ16]:** Since the list are captured within the application, how will the individual's be allowed to correct their information?

**Commented [EJ17]:** There are actual email's for all the users indicating they agree or request to be put on the listing?

Does that same request allow for the listing to be stored, shared, or used for any other purpose?



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

No, Campaign Monitor does allow all individuals subscribed to emails the opportunity to opt out in every email it sends out.

**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.*

**Privacy Risk:**

There is minimal risk. Individuals who want to change their contact information would need to unsubscribe and then subscribe again with their updated information.

**Mitigation:**

None

**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?**

Campaign Monitor is only used for email distribution.

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

Information Security and Privacy Awareness Training

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

**Privacy Risk:**

None

**Mitigation:**

None