

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: Online Library System (OLS)	
Preparer: April Errickson with assistance by Jim Mitchell (contractor)	Office: OEI-OEIP-LAD
Date: 05/16/2018	Phone: 919-541-5559
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):	
Definition <input type="checkbox"/> Development/Acquisition <input type="checkbox"/> Implementation <input type="checkbox"/>	
Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>	
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>.	
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>.	

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

The Online Library System (OLS) is data management system that allows authorized EPA library users to collect, store, retrieve and edit data pertaining to materials held by Environmental Protection Agency (EPA) libraries. OLS is made up of several modules that are accessed only by Authorized Library Employees, which includes both Federal and contractor staff. One of these modules (Circulation) is used to register an EPA employee or contractor in the event that they wish to borrow materials held in an EPA library collection. The Circulation Module is the only portion of OLS that uses PII of the same type as that held in the EPA Locator.

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 1971, Howard Messner, Deputy Assistant Administrator for Administration, signed EPA Order No. 1300.1, "Library Services setting up the Network," which outlined the development of an Agency-wide library system with a coordinated approach to library systems planning and operations.

OMB Circular A-130, Management of Federal Information Resources, Sections 8 and 9

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.

There is no information collected that is covered by the Paperwork Reduction Act.

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 Circulation module within OLS helps each of EPA's 25 libraries to track the library materials that are checked out to EPA employees and contractors from their locations. The module is comprised of Circulation data and Patron data. Circulation data consists of descriptive information about library materials (books, journals, etc.). Patron data consists of fields such as EPA employee or EPA contractor name, work address, work email address, office, office phone number, and project officer (for contractors). Only authorized library employees (federal and contractor) have access to the Circulation module and the data housed therein after signing into a maintenance area on the system using LAN ID and password. The data is accessed by the authorized library employees who only have access to the patron data input by their single location.

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

Authorized library employees manually enter information for patron data into the Circulation module based on verbal communication with the EPA employee or contractor wishing to

borrow materials. This is done for the first time when a library user physically enters the library location and wishes to borrow an item from the collection. The library user shows their EPA badge prior to the authorized library employee entering their information into the module. The information remains in the system in order to maintain an inventory of materials that are checked out to library users from EPA libraries.

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.

Each authorized library employee is responsible for ensuring accuracy of patron data that they enter. The authorized library employee sees both the library user's badge and they may check the patron data against the EPA Locator.

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:

Minimal Risk. Information used only to track materials checked out by the library user.

Mitigation:

None

Section 3.0 Uses of the Information

The following questions require a clear description of the systems use of information.

3.1 Describe how and why the system uses the information.

Patron data is used by the librarians to track library items that are borrowed from the EPA library collection. It allows the authorized library employee to assign a due date for the borrowed materials so that the library user knows when to return the materials to the library.

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.)

The authorized library employee logs into the OLS maintenance module using their LAN credentials, and searches for the library user's name in order to see a list of the materials the user has borrowed from the library.

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

Using the library patron name, the authorized library employee is able to call up their EPA location, EPA telephone, EPA email, list of library materials they have checked out and the due dates of the materials.

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

None known

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.

The OLS administrator authorizes users by adding their LAN usernames to the OLS Library account within the Oracle Identity Database. This action is performed using the Oracle Access Manager (OAM) tool. The authorized library employees can then access the OLS maintenance modules unique to their single location through ORACLE WEBGATE which will authenticate their provided LAN ID and password. There is no public or library user access to the information housed in the Circulation module.

Privacy Risk:

Minimal Risk.

Mitigation:

Only the System Admin and the authorized library users have access.

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.

When a library user physically enters an EPA library location and wishes to borrow an item, the authorized library employee communicates verbally that in order to borrow a book, they need to have a patron record in the Circulation module. Only an authorized library employee can access the system and input data.

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?

Individuals consent to provide their information when they check out items from a library. They can decline to provide personal information by simply not checking items out from the library. Due to the fact that the only patron data collected is that which is also in the EPA Locator, library users do not opt out of providing that information.

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:

In the event that the library user does not wish to provide the information, they will not be permitted to borrow materials from the library.

Mitigation:

There are no examples in which a library user declined to provide the authorized library employee with their work related patron data therefore no mitigation efforts have been required.

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?

In order to become an authorized library employee with access to the Circulation module, the federal employee seeking access or the EPA contractor's federal manager emails the Program Manager of the EPA Library Network and her federal backup asking for permissions to be set up and by stating the library employee/contractor has a need to access the Circulation module as part of their official duties. The Program Manager or her backup

approves the request and the database administrator is notified to add the user via the Oracle Access Manager.

After the above approval process, an authorized library employee may log into the system with their LAN ID and password which is associated with their location. The system then only allows access to those records belonging to the library where the authorized library employee works.

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

The OLS Database Administrator has access to all information in the system.

Authorized library employees, whom for the most part are EPA contractors have access to the data/information in the system, but only information created by and pertaining to their library location.

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)?

Federal Acquisition Regulations (FAR) clauses are included in the various library services contracts throughout the agency.

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

The LAN IDs for OLS users are registered through Oracle Access Manager by the OLS Database Administrator. Only users who have their LAN IDs registered can access OLS maintenance in order to access and edit data.

The OLS Database Administrator received credentials to manage the system and have access to all information housed there through the Cold Fusion Administrator and processes set up at the National Computing Center (NCC) in Research Triangle Park, NC.

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.

The library user's Locator type information is stored in the Circulation module in order for the library user to continue to borrow materials from the library throughout their employment at EPA. Library users remain in the system until they are manually deleted by an authorized library employee. Typically, employee separation procedures have a requirement to verify that departing EPA employees do not have library materials in their possession. When the library receives a clearance request and verifies that the employee

does not have any library materials, they are manually deleted from the system. In the event that a library user does not go through the clearance process, the individual libraries may wish to periodically check the Locator.

EPA Records Control Schedule: 0088

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

Yes, EPA Records Schedule 0088 lists the National Library Catalog, also referred to as the Online Library System (OLS).

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:

In the event that a library user is no longer employed by EPA as either a federal or contractor employee, there is a chance that their Locator-type information remains in the Circulation module. In order to check out materials, a library user shows their EPA issued identification. This is not viewed as a privacy risk.

Mitigation:

An EPA issued badge is required to borrow materials from the libraries. 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

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?

Patron record information is not shared by organizations either inside or outside of EPA.

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:

There is no privacy risk as patron information is not shared with other organizations.

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?

Library users do not have direct access to their information.

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

Individuals do not have access to their records. In the case of a change to any of the patron's details, the patron would notify the library and it would be a manual process completed by an authorized library employee. Alternatively, upon borrowing an item from the library, the authorized library employee would verify the information verbally.

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

The authorized library employee would verbally ask the library user if their information was still correct.

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:

None Identified.

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?

The Oracle Access Management system safeguards access by only allowing the OLS DBA and authorized library employees to have access to patron Locator-type data.

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

Annual EPA Information Security and Privacy Awareness Training is required of all authorized library employees.

8.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

None identified.

Mitigation:

None.