

## PRIVACY IMPACT ASSESSMENT

(Rev. 07/2018)

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 your LPO.

**System Name:** Office of Multimedia

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**Date:** June 5, 2019 (revised date)

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**Reason for Submittal:** New PIA \_\_\_\_\_ Revised PIA \_\_\_\_\_ Annual Review X Rescindment \_\_\_\_\_

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

Definition ☐

Development/Acquisition ☐

Implementation ☐

Operation & Maintenance ☒

Rescindment/Decommissioned ☐

**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 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 two years, after which the content is sent to the National Archives for permanent storage per EPA and NARA records-keeping regulations.

Cybersecurity implementation is designed understanding that EPA OMS has established defense in depth. OM has implemented the use of McAfee endpoint protection on the Mac systems separate from EPA LAN due to the nature of the office. These systems have been approved for operation via the ATO

camera/microphone recording devices of an individual's name, face and voice. 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 or audio broadcast via webcasting, closed circuit television, live broadcast television, press announcements, public educational films, internal EPA training media, etc. 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 OM multimedia services. 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, photographs, graphics, audio 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 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 content license agreement form. As stated in the agreement, 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.**

Reliance of data accuracy is conducted through visual inspection of files during processing. No other means are used to validate accuracy.

## **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.*

No

**3.4 Who (internal and external parties) will have access to the data/information in the system? If contractors, are the appropriate Federal Acquisition Regulation (FAR) clauses included in the contract?**

Only OM government-employed personnel, ORISE Fellows and EPA interns will have access to data.

**3.5 Explain how long and for what reasons 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, non-final products, raw video footage, audio/photo/graphics files for two years. Completed products and OM-captured content that meets records keeping requirements is sent to the National Archives for permanent historic preservation, which is researchable by obtaining a FOIA request or contacting NARA directly.

**3.6 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 the stated purpose and mission of the system.*

**Privacy Risk:**

Digital signatures, audit, network traffic logs, system logs, non-final products, raw video footage, audio/photo/graphics files need to be secured locally for a period of two years.

**Mitigation:**

OM content is secured physically behind a keyed main door, a cypher key access door and EPASS card reader door, under video surveillance. The data store is further secured by maintaining an off-network enclave for the primary database with restricted system access to OM personnel only. OM content is stored for a period of two years then transferred to the National Archives for permanent historic preservation.

## **Section 4.0 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.*

**4.1 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.**

## Section 5.0 Auditing and Accountability

*The following questions are intended to describe technical and policy-based safeguards and security measures.*

### **5.1 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.

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

OM will enforce the same EPA information network security and privacy practices by receiving annual training issued by OMS/OEI, and then applying the learned skills to the OM work environment.

### **5.3 Privacy Impact Analysis: Related to Auditing and Accountability**

#### **Privacy Risk:**

PIA information needs to be enforced and audited via automatic policy enforcement programs/applications.

#### **Mitigation:**

OM policy and auditing enforcement will be conducted by the ISSO, SO, and Chief Engineer in lieu of active directory automatic policy and auditing programs.

## Section 6.0 Uses of the Information

*The following questions require a clear description of the system's use of information.*

### **6.1 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 to produce educational, training, public information, specialty features, etc..

### **6.2 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**

*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:**

**Mitigation:**

## **Section 8.0 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.*

- 8.1 What are the procedures that allow individuals to access their information?**
- 8.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**
- 8.3 How does the system notify individuals about the procedures for correcting their information?**
- 8.4 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:**

**Mitigation:**