

PRIVACY IMPACT ASSESSMENT

(Rev. 07/2018)

Please submit your responses to your Liaison Privacy Official
http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf.

System Name: Region 2 Transit Subsidy		
Preparer: May Wong	Office: US EPA, Region 2, OPM-IRMB	
Date: January 23, 2020	Phone: 212-637-3327	
Reason for Submittal: New PIA ____ Revised PIA ____ Annual Review __x__ Rescindment ____		
This system is in the following life cycle stage(s):		
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>	Implementation <input checked="" type="checkbox"/>
Operation & Maintenance <input type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>		
<p>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>.</p> <p>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>.</p>		

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

The Region 2 Transit Fare Subsidy Program is fully endorsed and supported by Headquarters as it will benefit the environment by reducing traffic congestion, energy consumption and vehicular pollution. The transit system collects employees' information for the purpose of transit reimbursement. Information is being collected in connection with the Public Transit Subsidy Program authorized by Section 629 of Public Law 101-509. The information will become part of EPA's payment system, which is a Privacy Act system of records. Furnishing the information on this form is voluntary, but your failure to do so may result in disapproval of your application.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or Executive Order(s) permit and define the

collection of information by the system in question?

Solicitation of the information on this form is authorized by Public Law 101-509, Title IV, General provisions, Section 629, 104 Stat. 1478 (1990), cited in Federal Register Vol. 58., No. 141 of July 23, 1991, as implemented by the Federal Travel Regulation (FPMP 101-7), E.O. 11609 of July 21, 1971, E.O. 11012 of March 27, 1962, E.O. 9397 of November 22, 1943, and 26 U.S.C. 6011(b) and 6109.

- 1.2 Has a system security plan been completed for the information system(s) supporting the system? Does the system have or will the system be issued an Authorization-to-Operate? When does the ATO expire?**

Yes. November 13 2020

- 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 ICR required

- 1.4 Will the data be maintained or stored in a Cloud? If so, is the Cloud Service Provider (CSP) FedRamp approved? What type of service (PaaS, IaaS, SaaS, etc.) will the CSP provide?**

No

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).**

First and Last Name, Home Address, Employee ID, Employment Info. Information is collected through employees submitting their application for the transit subsidy

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

Employees participating in the program report transit expenses through the Transit Subsidy System

- 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.

Employees participating in the program report transit expenses through the Transit Subsidy System and are responsible for the accuracy of their data.

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 associated with data not being accurate.

Mitigation:

Employees participating in the program can log into the system and provide their latest transit information. A questionnaire is required to be completed annually by the employee to ensure their latest transit information is up to date and accurate.

Section 3.0 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.

3.1 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?

Access control levels are in place. Only administrators with assigned roles and responsibilities have access into the system

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

Region 2 has an Access Control SOP which describes users roles and responsibilities.

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

R2 OPM-IRMB and Financial Region 2 employees have assigned roles and responsibilities to administer the system

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?

R2 OPM IRMB and Financial Region 2 employees have assigned roles and responsibilities

to administer the system. Supervisor has access to their employees' information. No contractors are using this system

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.

EPA Schedule 1005, item b, which has a 6 year retention.

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:

The risk of having information retained beyond the length of time required.

Mitigation:

Region 2 has a Record Management Policy in place. Record control schedule is followed.

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.

No

4.2 Describe how the external sharing is compatible with the original purposes of the collection.

Not applicable

4.3 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

4.4 Does the agreement place limitations on re-dissemination?

Not applicable

4.5 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. There is no information sharing.

Mitigation:

None.

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?

Supervisors of the employees participating in this program are required to review and verify the transit information is accurate and is used in accordance for the purpose for the collection.

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

Users of the EPA system take the information security and privacy awareness training annually.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

The risk of the information not used in accordance with what stated in the PIA.

Mitigation:

Supervisors are required to review and verify the transit information is accurate and used relevant to the collection.

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.

For the purpose of transit reimbursement for employees

6.2 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.)

By name

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

EPA-41R

6.4 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 risk that information is not handled in accordance with the uses describe above.

Mitigation:

Supervisors of the employees participating in this program are required to review and approve the transit information for the purpose of transit reimbursement.

***If no SORN is required, STOP HERE.**

The NPP will determine if a SORN is required. If so, additional sections will be required.

Section 7.0 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.

7.1 How does the system provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

Privacy Notice

PRIVACY ACT NOTICE: In compliance with the Privacy Act of 1974, the following information is provided: Solicitation of the information on this form is authorized by Public Law 101-509, Title IV, General provisions, Section 629, 104 Stat. 1478 (1990), cited in Federal Register Vol. 58., No. 141 of July 23, 1991, as implemented by the Federal Travel Regulation (FPMP 101-7), E.O. 11609 of July 21, 1971, E.O. 11012 of March 27, 1962, E.O. 9397 of November 22, 1943, and 26 U.S.C. 6011(b) and 6109. The primary purpose of the requested information is to determine payment or reimbursement to eligible individuals for allowable travel and/or other expenses incurred under appropriate administrative authorization and to record and maintain costs of such reimbursement to the government. The information will be used by the Federal agency officers and employees who have a need for the information in the performance of their official duties. The information may be

disclosed to the appropriate Federal, state, local or foreign agencies when relevant to civil, criminal, or regulatory investigations or prosecutions, or when pursuant to a requirement by this agency in connection with hiring or firing of an employee, the issuance of a security clearance, or investigations of the performance of official duty while in government service. Your social security account number (SSN) is solicited under the authority of the Internal Revenue Code (26 U.S.C. 6011(b) and 6109 and E.O. 9397, November 22, 1943, for use as a taxpayer and/or employee identification number; disclosure is mandatory on vouchers claiming payment reimbursement which is, or may be, taxable income. Disclosure of your SSN and other requested information is voluntary in all other instances; however, failure to provide this information (other than SSN) required to support the claim may result in delay or loss of reimbursement.

Notification Procedures: Any individual who wants to know whether this system of records contains a record about him or her, who wants access to his or her record, or who wants to contest the contents of a record, should make a written request to the EPA Attn: Privacy Act Officer, MC2831T, 1200 Pennsylvania Avenue, NW., Washington, DC 20460.

7.2 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?

Contesting Records Procedure: Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete EPA Privacy Act procedures are described in EPA's Privacy Act regulations at 40 CFR part 16.

7.3 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:

The risks of insufficient notice and opportunity to decline or consent.

Mitigation:

Privacy statement is posted at the point of collection to provide users an opportunity to decline or consent.

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?

Employees participating in this program access their own information by logging into the system using their EPA credentials. Only administrators with assigned roles and responsibilities have access into the system

Record Access Procedure: Requests for access must be made in accordance with the procedures described in EPA's Privacy Act regulations at 40 CFR part 16. Requesters will be required to provide adequate identification, such as a driver's license, employee identification card, or other identifying document. Additional identification procedures may be required in some instances.

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

Employees participating in this program access their own information and responsible to maintain the accuracy of their information

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

Employees participating in this program access their own information and responsible to maintain the accuracy of 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:

The risk associated with the lack of opportunity for the individual to correct inaccurate information

Mitigation:

Employees participating in this program are allowed to access the system to correct any erroneous information.