EPA United States
Environmental Protection
Agency

PRIVACY IMPACT ASSESSMENT
(Rev. 04/2019)
(All Previous Editions Obsolete)

Please submit your responses to your Liaison Privacy Official
http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf. If you need further assistance, contact your LPO.

System Name: Social Media Content Management System	
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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: 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:

This is a Social Media Content Management System (SM CMS) that users will access and log into a website using their name and EPA email address. This is not an EPA system, it is a commercially available system and it will not be hosted on any EPA network. The SM CMS will allow EPA users to coordinate and share social media messages across multiple social media accounts and platforms, i.e. Twitter, Facebook, LinkedIn, Instagram. All social media content entered into the SM CMS will be derived from EPA press releases and other official announcements derived from regional and program offices; public affairs staff have cleared for public release and consumption.

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?

Section 2 of the E-Government Act of 2002 (Pub. L. 107-347, 44 U.S.C. 3601 n.)

Section 2 of the Paperwork Reduction Act of 1995 (Pub. L. 104-13, 44 U.S.C. 3501)

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?

The Social Media Content Management System consists of social media information housed on a shared secured SaaS application and is not an EPA system. [ATO WILL BE REQUIRED]

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?

Yes. FEDRAMP approved.

Social Media Content Management System (SM CMS) Social Media Content Management System (SM CMS) is a SaaS based application. The SaaS uses Amazon Web Services (AWS). A third-party review of the AWS GovCloud (US) Region and their FedRAMP authorizations attest to the controls in place within the AWS GovCloud (US) Region to ensure AWS supports customers building ITAR compliant systems on AWS**.**

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).

Social media posts consisting of news content and other information to be produced internally by EPA and made available to the public, for release and dissemination via EPA's social media accounts, and/or content that is already publicly available on EPA's website, press releases, announcements, reports, etc.

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

Public Affairs staff collect the information and develop the news content. All information is pulled from EPA publicly available web pages, reports, press releases, announcements, booklets, 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.

No. It only uses internal content entered into the system by approved users EPA public affairs staff, i.e. social media posts consisting of information approved for public release. This is not an EPA system, it is a commercially available system and will not be hosted on any EPA network.

2.4 Discuss how accuracy of the data is ensured.

All information has been reviewed and cleared for public release by public affairs sources.

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.

There is a low risk of unauthorized access of data.

<u>Mitigation</u>:

There is proper access control in place to prevent unauthorized access.

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?

There are no access controls, end users all have the same level of access and can work collaboratively viewing and disseminating the same relative information as needed.

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

Access controls are documented in these policies and procedures.

-- [Social Media Policy (PDF)](6 pp, 147 K)
-- [Using Social Media to Communicate Internally at EPA Procedure (PDF)](8 pp, 91 K)
-- [Using Social Media to Communicate with the Public Procedure (PDF)](9 pp, 97 K)
-- [Representing EPA Online Using Social Media Procedure (PDF)](6 pp, 77 K)

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

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 EPA employees who manage social media and public release of information will have access to the system; contractors do not have access.

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.**

Each regional and program office social media account is part of EPA Records Schedule 0094 – 305 Public Affairs (NARA Disposal Authority: N1-412-96-1/1). Therefore, the SM CMS does not require an EPA Records Control Schedule.

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 that this data will be inappropriately accessed or retained is minimal. Record Control Schedule is properly 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 information is shared externally.

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

No information is shared.

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?

No information is shared.

4.4   Does the agreement place limitations on re-dissemination?

No. There is no data shared.

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:

No risk. No data shared outside of the agency.

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 (Section 6.1)?

Information entered into the system must adhere to and follow agency established SOPs reference in paragraph 3.2.

The review and approval of content (workflow) already in place to ensure all data elements are accurate, accounted for, and used for purposes for collection as outlined in established SOPs.

5.2   Describe what privacy training is provided to users either generally or

specifically relevant to the system/collection.

All EPA users are required to take annual information security and privacy awareness training.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

Low risk of unauthorized access to the system

Mitigation:

The management system includes a workflow process that requires review and approval by senior EPA executives and public affairs officials. This ensures auditing and accountability.

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 SM CMS will allow EPA users to enter social media posts into one system and designate it to go live on multiple accounts they manage at once, i.e. Twitter, Facebook, LinkedIn, Instagram. While in the system, the posts are viewable by other social media coordinators across the agency who manage separate EPA social media accounts. Those coordinators can also choose to share any of these messages they see in the system to post directly to the social media accounts they manage. All social media content entered into the SM CMS will be derived from publicly available content used in EPA press releases, websites and other official release channels. Regional, program office and headquarters public affairs staff have cleared all information for public release and consumption.

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 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.)*

Information is retrieved by metadata that does not include PII.

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

N/A

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:

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

Mitigation:

Information is publicly available.

*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.

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?

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: N/A

Mitigation: N/A

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   <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>**:**

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