

# 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](http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf). If you need further assistance, contact your LPO.

<b>System Name:</b> Region 5 LAN General Support System (GSS)		
<b>Preparer:</b> Aldwin Jereza	<b>Office:</b> EPA Region 5	
<b>Date:</b> 10/15/19	<b>Phone:</b> (312) 886-0456	
<b>Reason for Submittal:</b> New PIA <input type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input checked="" type="checkbox"/> Rescindment <input type="checkbox"/>		
<b>This system is in the following life cycle stage(s):</b>		
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>	Implementation <input type="checkbox"/>
Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>		
<p><b>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>.</b></p> <p><b>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>.</b></p>		

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

Region 5 Local Area Network (LAN) General Support System (GSS), also known as R05LAN is a collection of platforms and systems that form a networked infrastructure to support data processing needs of EPA Region 5.

R05LAN GSS covers all Information Technology (IT) infrastructure, which includes hardware, software, applications, databases, communications and Internet access to support mission and daily operations within EPA Region 5. As a result, the information that is processed on or through can include virtually every type of information that EPA Region 5 creates, collects, uses, stores, maintains, disseminates, discloses and disposes of in support of its mission, which is to protect human health and environment. The components of the R05LAN GSS make up the fundamental hardware and software that provide connectivity, security, storage, communications, Internet access, and data access. The GSS includes client devices through which staff conduct daily work, and also central data storage and management devices.

This Privacy Impact Assessment (PIA) addresses the R05LAN GSS application which collects, compile and processes Personally Identifiable Information (PII): Pesticide Applicator Certification (PAC)

**Pesticide Applicator Certification (PAC):** Records are related to federal certifications to apply Restricted Use Pesticides (RUP) in Indian Country within the states covered by Region 5. Certification information is collected on [EPA Form 7100-01](#) completed by applicants. The data is entered into a secure/restricted local Access database which is sent via encrypted email to EPA HQ for collation into the Agency’s Restricted Use Pesticides (RUP) database repository.

This Privacy Impact Assessment (PIA) addresses the R05LAN GSS application which collects, compile and processes Personally Identifiable Information (PII): Pesticide Applicator Certification (PAC)

## **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?**

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 11(a)(1) provides for the certification of RUP applicators. 40 CFR 171.11 further describes certification procedures including the completion and submission of certification applications to EPA, issuance/revocation of certificates, monitoring of certifications, and applicator recordkeeping requirements. Title 7 United States Code, section 136i(a)(1) authorizes the collection of this information. See [EPA-59](#)

### **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, the R05LAN GSS System Security Plan is updated and reviewed according to the Agency continuous monitoring plan. The system has an EPA CIO ATO which expires March 5, 2021

### **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.**

Certification information is collected under OMB Control No. 2070-0029 on [EPA Form 7100-01](#) completed by applicants

### **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).**

Records will include requests, denials, certifications, correspondence, and Agency decisions related to applicators seeking and maintaining federal certifications. The database has fields for 1. contact information (e.g. name, address, phone number, email address); 2. identification information (e.g. birth date); 3. certification information (e.g. state/federal certification number, certification type, categories, expiration date); 4. information regarding qualifications (e.g. records of training, records of compliance)

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

Data is provided by the requestor on the Federal Pesticide Applicator Certification Form. [EPA form number is 7100-01](#) and submitted to the appropriate region. The form is filled out by the pesticide applicator requesting federal certification to be able to apply restricted use pesticides under the EPA Plan for the Federal Certification of Applicators of Restricted Use Pesticides within Indian Country.

**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.**

Certification information provided by the requestor is verified via publicly available information on state websites.

**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:**

Risk of collecting incorrect information or collecting more data than required.

**Mitigation:**

Data is collected directly from the individual requester and can be verified against publicly available information. A review is conducted annually to ensure only minimal necessary data is collected.

**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?**

The PAC access database is located in a folder on a Regional server with NTFS access control configured restricting access to the four applicable users. Access is further restricted via login/password which allows use by a single user at a time.

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

Procedures are in the document "SOP – Regional Database (webinar) MP 10-23-13.docx"

**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?**

Four designated EPA staff with CBI-clearance currently have login/network access to the database. No contractor 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.**

The information is retained for as long as needed under EPA Records Schedule 0090

### 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:**

- Retaining data for overly long duration
- Unauthorized individuals gaining access to PII
- Improper disposal of collected data

#### **Mitigation:**

- Unique ID and dual-factor authentication to R05LAN is enforced, access to database on the network is restricted via network permissions to the four authorized personnel.
- Record control schedules as applied to the records are a mitigating factor.

## 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, the data is for EPA internal use.

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

No data shared with other systems. N/A.

### **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?**

The data is for EPA internal use. N/A.

#### **4.4 Does the agreement place limitations on re-dissemination?**

The data is for EPA internal use. N/A.

#### **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. The data is meant solely for internal EPA use.

##### **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)?**

There are documented Standard Operating Procedures for the Restricted Use Pesticide application database that trained individuals adhere to. Access to the database is restricted to a select few trained individuals who work in pairs to ensure all required information is collected accurately, and also ensure the information is being used for the sole purpose of which it is collected. Database users are trained to protect the PII of applicants.

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

Privacy training is included as part of the mandatory Annual Information Security and Privacy Awareness training. This includes the definition of what constitutes PII, safeguards and best practices to handle PII.

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

##### **Privacy Risk:**

- Improperly implemented auditing and accountability safeguards could allow authorized users to access PII and exceed their authority/ use the data for unofficial/unauthorized purposes.

- Improperly implemented auditing and accountability safeguards could allow authorized users making unauthorized changes to the data.

**Mitigation:**

- Concurrent login access is not permitted. Only one authorized user can login and make changes and alternate permitted user confirms entered data.

## **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 information is used to make a decision on whether or not to certify a RUP applicator. EPA will document the actions it takes with each “EPA ACTION” (initial certification, duplication/replacement, recertification, denial) and will send notification to these individuals in the form of letters with attached certification cards. Limited federal certification-related information (e.g. applicator name, contact information, and certification number/category/period) will be posted to an EPA website in order to enable interested persons to identify applicators certified by EPA in various categories and to facilitate communication between tribes and certified applicators.

Information is collected to track the certification status for every applicator requesting a certification under the EPA Plan for the Federal Certification of Applicators of Restricted Use Pesticides within Indian Country. Each applicator receiving a federal certification must have a valid underlying state, tribal or federal certificate in order to be eligible. Private applicators also have the option to complete required training in lieu of an underlying certificate. EPA will enter the applicator’s information regarding certification as Private or Commercial Applicator, and on a routine basis, verify those applicators with underlying certifications.

EPA will also setup expiration dates based on certifications requested and produce reports for recordkeeping and the web.

### **6.2 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.)**

The system is designed to retrieve information using the name or Federal Applicator Number (FAN) of the applicator. The primary retrieval method is by the applicator's name.

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

## 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:**

- Individuals authorized to access PII could exceed their authority and use the data for unofficial/unauthorized purposes.

### **Mitigation:**

- PII stored in and transiting through the R05LAN is only viewable by specific EPA personnel with a need to know the information, i.e., employees who require access to perform their job functions, and who are bound by non-disclosure policies and/or agreements.
- The four authorized employees have gone through a background/higher clearance investigation prior to gaining access to the application.
- R05LAN system administrators strictly manage access control and limit the use and access of all data for the purpose for which it is collected.
- Only data that is necessary for the purpose for which the system was designed is collected. No sensitive PII collected.

**\*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 is provided as part of the instructions on the [EPA form number is 7100-01](#)

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 11(a)(1) provides for the certification of RUP applicators. 40 CFR 171.11 further describes certification procedures including the completion and submission of certification applications to EPA, issuance/revocation of certificates, monitoring of certifications, and applicator recordkeeping requirements. Title 7 United States Code, section 136i(a)(1) authorizes the collection of this information.



## **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?**

Opportunity to opt-out of the collection is provided under the Privacy Act Statement on the collection form. [EPA form number is 7100-01](#)

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 11(a)(1) provides for the certification of RUP applicators. 40 CFR 171.11 further describes certification procedures including the completion and submission of certification applications to EPA, issuance/revocation of certificates, monitoring of certifications, and applicator recordkeeping requirements. Title 7 United States Code, section 136i(a)(1) authorizes the collection of this 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:**

- The applicator may not read the entire instructions on the forms prior to filling in the requested information.

### **Mitigation:**

- The instructions are clearly stated on the form and it is the responsibility of the applicator to read through and adhere to all provided instructions.

## **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?**

Persons seeking access to their own personal information in this system of records will be required to provide adequate identification (e.g., driver's license, military identification card, employee badge or identification card) and, if necessary, proof of authority. Additional identity verification procedures may be required as warranted. Requests must meet the requirements of EPA regulations at [40 CFR part 16](#). See [EPA-59](#)

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

Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete EPA Privacy Act procedures are set out at [40 CFR part 16](#).

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

Notification Procedures: Requests to determine whether this system of records contains a record pertaining to you must be sent to the Agency Privacy Officer. The address is: U.S. Environmental Protection Agency; 1200 Pennsylvania Ave. NW., Room 2335; Washington, DC 20460; (202)566-1667; Attn: Privacy Officer. – [See EPA-59](#)

## **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:**

- **None.** Procedures are in place for requests to correct records

### **Mitigation:**

None