PRIVACY IMPACT ASSESSMENT

Submit in Word format electronically to: Judy Earle (earle.judy@epa.gov)

Office of Environmental Information

System Name: Mass Notification System	
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Date: October 12, 2016	Phone: 202-564-6282
This project is in the following life cycle stage(s):	
Definition Development/Acquisition Implementation	
Operation & Maintenance	
Note: Existing Systems require an updated PIA when there is a <u>significant modification</u> or where changes have been made to the system that may create a new privacy risk. For a listing of <u>significant modifications</u> , see OMB Circular A-130, Appendix 1, Section (c) (1) (a-f) at http://www.whitehouse.gov/omb/circulars/a130/a130appendix i.aspx	

I. Data in the System

1. What data/information will be collected/contained in the system?

First and Last Name, Work Location (Building), EPA Desk Phone Number, EPA Mobile Phone Number, EPA Email Address, Personal Mobile Phone Number (voluntary), Personal Home Phone Number (voluntary), Personal Email Address (voluntary)

2. What are the sources and types of the data/information in the system?

EPA Phone Number Databases; EPA Email Database; EPA Active Directory; Individually Volunteered Information

3. If the system has been modified, are the original personally identifiable information (PII) elements still being collected or contained in the system? If no, what are the elements currently being collected? When did the collection of the original PII elements stop? How was the old data removed from the system?

N/A

4. How will the information be used by the Agency?

Contact information collected will be used by the Agency to provide emergency, non-emergency, and EPA Headquarters (HQ) accountability (per Federal Continuity Directive 1) process alerts and notifications, and mass alert and notification tests and drills, to Agency personnel at EPA HQ (EPA HQ personnel include EPA employees, contractors, and grantees).

5. Why is the information being collected? (Purpose)

The information is being collected to build a database of contact information to be used to provide emergency, non-emergency, and EPA HQ accountability (per FCD-1) information, and perform mass alert and notification tests and drills for Agency personnel at EPA HQ (EPA HQ personnel include EPA employees, contractors, and grantees).

II. Access Controls for the Data

1. To ensure user authentication, does the system have limited login attempts or require security question answers? If yes, when the user becomes locked out how will they gain access to the system?

Login is limited to three (3) attempts. After the third attempt, you are required to enter your Member ID and answer a security question. A temporary password is then sent to the email address registered with the account. The temporary password is required to be changed upon login to the system.

2. How often are passwords required to be changed?

Every 90 days.

3. Who will have access to the data/information in the system (internal and external parties)? 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)?

Security Management Division Federal Employees and Contractors. FAR clauses are included in the contract.

4. How will you educate individuals/users having authorized access about the misuse of PII data? Will users receive privacy training before gaining access to the system?

All authorized account administrators have already received General Privacy Awareness Training in 2013, and will take refresher training as needed.

5. Has the data in the system been encrypted according to the National Institute of Standards and Technology (NIST) requirements? (Note: this requirement is for sensitive PII only)

Yes

6. Do other systems share or have access to information in this system? If yes, who authorized the sharing? If information is being shared, please provide a copy of any agreements that were issued. (i.e., System Administrators, System Developers, System Managers)

No

7. Will other agencies, state or local governments, or other external parties (i.e., non-EPA) share or have access to information in this system? If so, what type of agreement was issued? (i.e., ISA, MOU, etc.) (<u>If any agreements were issued</u>, the Privacy Program needs a copy for its records.

No

8. Will data and/or processes be converted from paper to electronic? If so, what controls are in place to protect the data from unauthorized access or use?

No

9. Will data be shared from a system of records (SOR) with another federal agency? If so, has a computer matching agreement been initiated?

No

III. Attributes of the Data

1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed. (*Provide an example or explain*)

The Mass Alert and Notification System is design to send voice and text messages to devices pre-selected by its users. The contact information data collected by the system will be used to ensure users receive EPA Headquarters emergency, non-emergency, and accountability information.

2. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? 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.)

Information is collected via system's secure web portal.

- 3. Has the system undergone a risk analysis to identify harms that may result from technical failures, malevolent third parties or human error? Yes_X_ No___ (Note: The risk analysis will help identify possible risks to the data in the system.)
- 4. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? Yes_X_ No___ If yes, how is notice given to the individual? (Privacy policies must clearly explain where the collection or sharing of certain information may be optional and provide users a mechanism to assert any preference to withhold information or prohibit secondary use.)

Mass Notification System's Privacy Notice.

5. Where is the on-line privacy policy posted?

System provider's web page and web portal.

IV. Maintenance and Administrative Controls

1. Has a record control schedule been issued for the records in the system or the system itself? If so, provide the schedule number. (You may check with the record liaison officer (RLO) for your AA-ship or Tammy Boulware, Headquarters Records Officer, to determine if there is a retention schedule for the subject records. All systems <u>must</u> have a record control schedule.)

No

2. While the data are retained in the system, what are the requirements for determining that the information collected remains sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

Users voluntarily participating in the system will maintain their own information and ensure it is accurate, relevant, timely, and complete. Bi-annual database management by system administrators will add new users and remove users no longer with the agency. Linking to the Active Directory will ensure accurate, relevant, and timely information is maintained within the system.

3. Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain.

No.

4. Does the system use any persistent tracking technologies?

No

5. Under which System of Records (SOR) notice does the system operate? Provide the name of the system and its SOR number if applicable. All Agency SORs are posted at http://www.epa.gov/privacy/notice/. (A SOR is any collection of records under the control of the Agency in which the data is retrieved by a personal identifier. The SOR must contain the same categories of records and cover the same routine uses as your system.)

TBD