

**Office of Environmental Information
National Privacy Program
Onsite Review Form for Sensitive Systems and Systems of Records**

The Privacy Act of 1974 and the Electronic Government Act (E-Gov) requires agencies to conduct onsite reviews. The laws also requires Agency's to ensure that their systems of records only contain information about an individual that is relevant to support an administrative or mission-related process and that the information is accurate, timely, complete, and relevant. E-Gov requires agencies to limit the collection of personally identifiable information (PII) to only that which is necessary. This review will determine how EPA is complying with these and other requirements governing agency PII collections. The Privacy Officer and Liaison Privacy Officials (LPOs) will work together to ensure that the Agency is properly managing and safeguarding its PII collections.

Name of System:	
SORN Number (if applicable):	
Office:	
System Owner:	
Review Conducted By:	
Date Review Completed:	

Is this an electronic or paper system? Electronic ___ Paper ___ Both ___

I. Please review the system and answer the following questions about the sections identified below:

Have you reviewed the system in its entirety? Yes ___ No ___

A. Purpose

Does the purpose identified on the Privacy Impact Assessment (PIA) adequately describe why the system is needed? Yes ___ No ___

B. Category of Individuals: *[This section identifies the individuals whose information is collected in the system.]*

1. Are the categories still accurate? Yes ___ No ___ (If **no**, what changes are needed?)
2. Have any new categories been added? (Are you collecting information on individuals who are not identified?) Yes ___ No ___

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C. Category of Records: *[This section lists the PII elements contained in the system.]*

1. What are the adverse consequences, if any, of not collecting the PII?
2. What are the PII elements?
3. Are all PII elements accurate? Yes ___ No___
4. Are all PII elements still needed? Yes ___ No__
5. Can any of the PII elements be eliminated from future collection activities?
Yes ___ No__ (If **yes**, which elements?)
6. Sensitive PII
 - a. Does this system contain SSNs? Yes ___ No___. (If no, go to “**F**”).
 - b. Are SSNs still being collected? Yes ___ No__
 - c. Can an alternative identifier be used? Yes ___ No___. (If **yes**, how?)
 - d. Are there any plans to use an alternative identifier? Yes ___ No___. (If **yes**, when?)
 - e. Are the SSNs protected from unnecessary disclosure? (e.g., truncated, not displayed)
Yes___No_____
 - f. Does this system contain medical or financial information about individuals?
Yes ___ No___. If **yes**, which one? Medical, financial or both?

D. Routine Use Disclosures *[This section lists the entities/users with whom the information may be shared.]*

1. What are the principal purpose(s) for which the information is intended to be used?
2. How does the information collected relate to the legal purpose for which the system is developed/maintained?
3. Are all the external routine uses (sharings) still needed? Yes___ No_____
4. If **no**, what routine uses (sharings) can be eliminated?

E. Is this an Exempted System under the Privacy Act? Yes ___ No _____
If **yes**:

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1. Is the rule current, relevant, and up to date? Yes _____ No _____
2. What is the Federal Register number and date of the published rule?

F. Is this system remotely accessed? Yes _____ No _____

1. Has there been a request for remote access? Yes _____ No _____
2. How many requests for remote access/transporting sensitive PII offsite has been received? _____
3. Was the request form(s) signed and maintained by the SIO? Yes _____ No _____

II. Forms

- A. Is a form used to collect information from this system? Yes ___ No ___
 1. What is the form number? _____ Date of last revision: _____
 2. Does the form collect SSNs? Yes ___ No ___
 3. Does the form have a Privacy Act Statement? Yes ___ No ___

III. Recordkeeping Practices

- A. What is the record control schedule (RCS) number for the records stored in the system? _____
- B. How long are the records kept before they are retired? _____
- C. How long are the records kept before they are destroyed? _____
- D. Is there an automatic function/process that removes or deletes records based on the RCS?
Yes ___ No ___
- E. Is there a manual process for managing the records lifecycle? Yes ___ No ___
(If yes, explain:)
- F. If there is no automatic or manual function to remove/destroy records, how are the records being retired/destroyed?

IV. Section M (to be completed by OARM/OAM)

- A. How many contracts were reviewed? _____

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- B. How many contracts require privacy clauses? _____
- C. How many contracts have privacy clauses? _____
- D. How many contracts do not have privacy clauses? _____

V. Privacy Violations

- A. Number of known and willful disclosures of Privacy Act information to any person not entitled to receive it? _____
- B. Number of System of Records maintained without meeting the public notice requirements? _____
- C. Number of known and willful incidents requesting or obtaining records under false pretenses? _____

VII. Computer Matching Programs

- A. Does your organization participate in any Computer Matching Programs? Yes___ No___
- B. Is the sharing of the data manual? Yes___ No___ (If yes, was an MOU issued?)
- C. Is the sharing of the data automated? Yes___ No___ (If yes, was an ISA/CMA issued?)

If any agreements were issued, the Privacy Program will need a copy for our files.

VI. Privacy Training

- A. Has the staff in your office been trained on protection of PII? Yes___ No___
- B. When was the last privacy training conducted for your employees?
- C. When was the last privacy training conducted for your contractors?

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D. Who presented the training?