United States Environmental Protection Agency

PRIVACY IMPACT ASSESSMENT

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

Office of Environmental Information

System Name: Pesticide Registration Information SysteM (PRISM)	
Preparer: William Christopher Northern	**Office: OCSPP/OPP/ITRMD**
Date: 09/07/2016	**Phone: 703-305-6478**
Reason for Submittal: New PIA__x__ Revised PIA____ Annual Review____	
This project is in the following life cycle stage(s):	
Definition ☐ Development/Acquisition ☒ Implementation ☐	
Operation & Maintenance ☒ Termination/Decommissioned ☐ **Note: Existing Systems require an updated PIA when there is a significant modification or where changes have been made to the system that may create a new privacy risk. For a listing of significant modifications, 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 elements will be collected/contained in the system? **Internal employee names and External Records with contact information (Name, Address, Phone number) for Companies.**

2. What are the sources (people/systems) and types (categories) of the data/information in the system? **Pesticide registrants submit forms, proposed product labels, scientific study data, and other documents supporting the pesticide regulatory process. EPA staff enter associated reviews, assessments, correspondences, and other documentation and data**.

3. Why is the information collected? **To support implementation of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); the Food Quality Protection Act (FQPA); and related legislation.**

4. How is the information collected? **Information from the pesticide industry is either submitted in paper format and then scanned into the system or submitted electronically via the EPA Central Data Exchange. Documents and data produced by EPA are uploaded or directly entered into the system.**

5. Is this a paper and/or electronic collection of data? **Combination paper and electronic**

6. How will the information be used by the Agency? **In support of the regulation of pesticide products and chemicals.**

7. If the system has been revised or terminated, are the original personally identifiable information (PII) elements still being collected or contained in the system? Yes___ No___ N/A__X__.

    a. 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?

II. Access Controls for the Data

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? **Yes**
    - If so, what control levels have been put in place? If no controls are in place why have they been omitted? **System level and role-based access**.

2. 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) N/A**

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. How will you educate individuals/users having authorized access about the misuse of PII data? What type of training will users receive? **Users receive EPA provided training on PII.**

5. Who *(internal and external parties)* will have access to the data/information in the system? 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)? **Federal and contractor staff that are FIFRA CBI cleared have access as needed to accomplish the OPP mission**. **The FAR clauses are not mentioned in the Ace contract.**

6. Will other systems, agencies, state or local governments or other external parties (i.e., non-EPA) share or have access to information in this system? Yes___ No_X__. If yes, what type of agreement was issued *(i.e., ISA, MOU, etc.,)? <u>If any agreements were issued, please supply the Privacy</u>*

Program a copy of the agreement. **Some information in the system related to the pesticide products themselves is made available to external parties, no sensitive (FIFRA CBI, PII) is included in that data.**

7. 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? **The paper to electronic conversion is an ongoing process. Both the development of the electronic system and the management of the electronic data is performed by FIFRA CBI-cleared personnel.**

III. Attributes of the Data

1. 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.)* **User name and password. No PII is used as an identifier.**

2. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? Yes___ No__X_ 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.)*

3. Where is the privacy policy (paper-form)/notice (electronic-webpage) posted? **N/A**

4. Has a record control schedule been issued for the records in the system or the system itself? If so, provide the schedule number. **Yes**

5. 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? **Auditing and SOPs**.

6. Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain. **No**

7. Does this system use any persistent tracking technologies? **No**