



PRIVACY IMPACT ASSESSMENT

(Rev. 2/2020)

(All Previous Editions Obsolete)

Please submit your responses to your Liaison Privacy Official. *All entries must be Times New Roman, 12pt, and start on the next line.* If you need further assistance, contact your LPO. A listing of the LPOs can be found here: https://usepa.sharepoint.com/:w:/r/sites/oei_Community/OISP/Privacy/LPODoc/LPO%20Roster.docx

System Name: Emissions Inventory System	System Owner: Jonathon Miller
Preparer: Brandon Little	Office: OAR/OAQPS
Date: 2/17/2021	Phone: 919-541-4059
Reason for Submittal: New PIA ____ Revised PIA ____ Annual Review <u>X</u> Rescindment ____	
This system is in the following life cycle stage(s):	
Definition <input type="checkbox"/> Development/Acquisition <input type="checkbox"/> Implementation <input type="checkbox"/>	
Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>	
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>	
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>	

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

Collect emissions information from State, Local, and Tribal government agencies. Emissions information include descriptive information about the point sources that produce the data. This information is compiled and analyzed in producing the National Emissions Inventory.

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 Register Citation: 40 CFR Part 51

Authority 42 U.S.C 7410

- 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 – March 19, 2022

- 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?**

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).**

The system collects, uses, and maintains the following data elements pertaining to individuals: First name, last name, work address, work phone numbers, work email address, and supervisor information. The application does not disseminate any of these data fields.

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

The information is provided by the system users at the time of registration. The user can update the data when they deem necessary.

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.

The registered user is responsible for the accuracy of their information. If any information is incorrect, they are permitted to update/modify their own data. The information is used within the application to provide informational messages about activity within the application (for example, to notify user when a requested report has completed). This registration requires verification and approval by the designated contact for the State, Local, or Tribal agency requesting that the user be created.

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:

PII collected is business/agency information which could be compromised.

Mitigation:

EIS utilizes the EPA WAA security portal to house all user information. User information is protected by EPA systems and is not located in the EIS database. The risk has been transferred to OMS for enhanced protections.

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?

Yes – AC-2(c): Establishes conditions for group and role membership; Users may access information pertaining to their own account. Only defined system account managers may access account information of other users.

3.2 In what policy/procedure are the access controls identified in 3.1, documented?

All users may access information pertaining to their own account. Only defined system Account Managers may access account information for other users. These controls are defined in the EIS System Security Plan (stored in Xacta).

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?

EPA Federal staff identified as “Account Managers” have access to this information. No contractors are authorized to be Account Managers in the production application.

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.

For reasons of data integrity, every change to the Emissions Inventory System data is tracked to the user who made the change. Therefore, the name and organizational contact information for users is stored permanently.

EIS Record Schedule Number: 0002

Data is kept indefinitely or until deemed no longer needed by the Agency. The data is used to verify user provided data with an authorized user.

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:

There is a risk that record will be maintained longer than necessary.

Mitigation:

The EPA records retention requirements determined EIS data will be archived and held indefinitely. The retention requirements are reviewed annually, and, if possible, unnecessary data will be removed. Any personally identifiable information that can't be removed has been obfuscated using hashing algorithms and salts to prevent data from being readable if exfiltrated. There is no plain text PII data held in the database.

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 user information is now shared outside of EPA.

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

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?

N/A

4.4 Does the agreement place limitations on re-dissemination?

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:

No data is shared outside of EPA

Mitigation:

None required. Information is not shared outside of EPA.

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 as stated in Section 6.1?

The system does not enforce the practice automatically, but all data transactions are logged at the application and database level. Audits of the system logs will determine if any noncompliant

actions are taken. EIA administrators and the OMS WAA team utilize separation of duties to ensure only certain roles can do predefined actions.

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

Since the only personnel who have access to user metadata are Federal EIS staff, their training consists of the annual EPA Information Security and Privacy Awareness Training, and role-based training for system managers.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

Untimely or improper audit which could lead to improper account of data.

Mitigation:

Proper and timely audit system in place which is adhered to annually.

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 application uses the email address to notify users when batch processes requested by the user have completed (reports, batch XML file submissions, etc.). The application uses the first and last name information for display of who performed record changes when creating record audit logs. The address and phone number information are not used by the application, but are available to system managers who may need to contact the user for questions related to their emissions inventory.

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.)

The Agency's WAA sends a validation code to EIS for registered users of EIS. This code is transferred to/from the WAA and EIS and eliminates the need for any personal data to be stored on the EIS database(s), but allows users to view emissions inventory data stored in the EIS database.

6.3 What type of evaluation has been conducted on the probable or potential effect of the privacy of individuals whose information is maintained in the system of records?

All personal information used for registration to EIS is already public business information. All information can be found on federal, state, local, or tribal websites, or can be requested directly from the user's agency. The EIS team has evaluated what data is required to use the system, and initiated steps to remove the amount of data required to register to name, business address, and business email. These are only needed for communication to the end user. Should any personal data become exposed, the privacy impact would be minimal.

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:

Low risk of information misuse.

Mitigation:

Audits of the system logs will determine if any noncompliant actions are taken.

***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:

Mitigation:

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 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:

Mitigation: