

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/oci_Community/OISP/Privacy/LPODoc/LPO%20Roster.docx

System Name: OM	System Owner: Jini Ryan
Preparer: Anthony Singleton	Office: Office of Multimedia
Date: 1/31/2024	Phone: 202-564-2293
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:

EPA’s Office of Multimedia (OM) is the full-service multimedia production unit. Through broadcasting, webcasting, photography, and graphics, OM helps keep EPA staff and the general public informed and up to date on the latest Agency activities and messages.

All multimedia produced in EPA’s video studios (Studio One) are captured or created, edited, encoded, and broadcast for public distribution. OM keeps a database of all captured or created media for a period of five years, after which the content is sent to the National Archives for permanent storage per records keeping regulations.

Cybersecurity implementation is designed understanding that EPA has established defense in depth. OM will implement the Crowdstrike Falcon EPS with Tenable Nessus vulnerability scanning separate from EPA OMS security solutions due to the nature of the office. These software packages will provide OM ISSO the ability to utilize EPS, Antivirus, Virtual Firewall, and STIG vulnerability scanning.

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?

Video and audio data often transferred to OM or collected by OM will be the interview subject's name, workplace, and job titles. Business phone number is collected via email for communications purposes only.

In accordance with OMB Circular No. A-123, Section VII(A) and 44 U.S.C. § 3501 note. Section 208(b); OM system is designed not to collect any additional PII type. All multimedia content generated by OM is in the public-domain and falls under "fair use."

IAC w/ NIST SP 800-122 the only PII collected is the person's name. Business phone number, workplace, and job titles are not considered PII.

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?

OM does have a SSP published in Xacta. OM has a current ATO due to expire in March 16, 2024.

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.

Not 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?

Yes, footage is stored in Box, a cloud SaaS, which is FedRAMP certified.

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).

Video and audio data often transferred to OM or collected by OM will be the interview subject's name, workplace, and job titles. Business phone number is collected via email for communications purposes only.

The system collects raw analog or digital video/audio from various camera/microphone input devices in conjunction with digital recording devices. Digital photography is also taken for record. This data is then manipulated for storytelling or information distribution purposes. The final dissemination of the product is used to transmit the intent of EPA's mission to the public and EPA employees on behalf of the Office of the Administrator. The format of the product could take the form of any or all of the following: video/audio broadcasting via satellite, closed circuit television, live broadcast television, webcasting, press announcements, public educational films, social media or internal EPA training media. All multimedia content generated by OM is in the public domain and falls under "fair use."

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

The source of the information is dependent upon the formal request of the internal EPA office or external element that has requested the services of OM. The content is dependent on the type of multimedia service that is needed, for example: B-roll video footage, radio or video interviews, live footage, educational films, training videos, webcasting, web meeting, photographs, graphics, podcasting, etc.

2.3 Does the system use information from commercial sources or publicly available data? If so, explain why and how this information is used.

In the course of content creation, OM sometimes relies on commercially available materials like interview footage from contractors, other federal/state/tribal partners, or EPA stakeholders etc. that is obtained directly from each source. Non-public information obtained from specific individuals or entities (stakeholders) is used only with express permission from the copyright owner through an EPA consent form and licensing agreement. This material is stored only for use in the multimedia content under production and does not transfer to the National Archives as they are not official EPA records and the copyright remains with the source of the material.

2.4 Discuss how accuracy of the data is ensured.

The data is retained on an off-network DAMS server that resides only within OM. Reliance of data accuracy is high as only assigned/authorized personnel have access to this data.

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:

There is a risk that the media produced is falsified.

Mitigation:

At the time of recording one-on-one content with individuals, OM obtains signed consent from the subject using documentation reviewed and approved by the Office of General Counsel to use their likeness. Any media procured from an individual or entity for use in an EPA multimedia product, (example photos, video clips, etc.), is also obtained using a signed license agreement form, also approved by the Office of General Counsel, granting the agency permission to use the material in specific products.

The system collects raw digital video/audio from various camera/microphone input devices in conjunction with digital recording devices. Digital photography is also taken for record. This data is then produced into multimedia content to include public service announcements, feature stories, infographics, photo slideshows, audio podcasts, social media clips, etc., to disseminate agency messages to EPA employees, stakeholders, and the public.

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?

OM production systems will not have access control levels installed beyond two factor authentications due to the operational requirement of multimedia transfers and editing software needing full administrator access for proper use, as well as multimedia production

requirements in support of the agency. All personnel will have the ability to have access to the data stores with the Chief Engineer as the systems administrator.

EPA OMS-owned equipment will follow normal prescribed controls based upon OMS policies and practices.

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

The policy is uploaded and available in Xacta:

012 MOSS (OM) SIGNED POLICY - Authentication Management 2019-012-ITCS (IA5)

3.3 Are there other components with assigned roles and responsibilities within the system?

None

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?

Only OM government-employed personnel and authorized OM ORISE Fellow or OM interns will have explicit access to the data.

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.

Record schedule class 722 has been established. OM maintains digital signatures, audit, network traffic logs, system logs, and deliberative product, final product, video footage, audio/photo/graphics files for five years, per records keeping protocols. Completed products and raw OM-captured content considered an official agency record is shipped to the National Archives for historical preservation, which is researchable and obtainable via a media/public query, a FOIA request or contacting NARA directly.

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 OM maintenance of digital signatures, audit, network traffic logs, system logs, and deliberative and final product, video footage, audio/photo/graphics files for an extended period of time.

Mitigation:

OM maintenance of digital signatures, audit, network traffic logs, system logs, and deliberative and final product, video footage, audio/photo/graphics files for a storage period of five years is secured physically behind a keyed main door and a crypto key access door. The data store is further secured by maintaining an off-network enclave for the primary database and relying upon EPA's established network designed defense in-depth schema for protection. OM content, considered official agency records, is stored for a period of five years then transferred to the National Archives for historical preservation.

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.

Yes, information is created to be shared outside of EPA as part of normal agency operations through the Office of Public Affairs. All OM-captured and generated content is considered "fair use" and readily available to the public upon request thus do not need EPA to engage in an information sharing agreement. The data is public information and available to other federal agencies, state/tribal, and local governments, EPA stakeholders and the general public through the EPA website, news sites, social media channels and web-based hosts, a media query or through a FOIA (Freedom of Information Act) request. Other federal agencies, state/tribal, or local governments and EPA stakeholders do not have direct access to EPA's Box, a cloud SaaS system.

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

Multimedia data is shared with external sources with an approved FOIA (Freedom of Information Act) request. The data shared is considered "fair use" and available for external use through media queries or content requests from the public.

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?

OM system does not conduct any information sharing beyond a formal FOIA, media query or public content request.

4.4 Does the agreement place limitations on re-dissemination?

All OM-captured and generated content is considered “fair use” and readily available to the public upon request.

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:

There is a risk that OM could be using footage without the consent of the individual.

Mitigation: All OM-captured and generated content is considered “fair use” and readily available to the public upon request. At the time of recording one-on-one content with individuals, OM obtains signed consent from the subject using documentation reviewed and approved by the Office of General Counsel to use their likeness. Any media procured from an individual or entity for use in an EPA multimedia product, (example photos, video clips, etc.), is also obtained using a signed license agreement form, also approved by the Office of General Counsel, granting the agency permission to use the material in specific products.

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 collects raw analog or digital video, audio, graphics and photo assets from a variety of sources. The acquired data is used to inform EPA employees, stakeholders and the public about the agency’s mission and priorities. Content is stored on secure GFE systems and used in conjunction with specific projects and agency messaging needs. This content is collected, edited, and produced separately and isolated from the EPA LAN. OM uses a date-based/topic-based naming convention for all captured content. OM producers, in conjunction with the OM director, manage each production data set.

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

OM enforces the mandatory agencywide Information Security and Privacy Awareness Training. OM Director provides verbal instructions on obtaining consent and license agreement forms.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk: OM loses track of multimedia created in the office.

Mitigation:

OM tasks individual producers to manage each production data set. Each producer is held responsible for data integrity and for ensuring backups are in place on the OM archive. The OM archivist verifies media via visual checks for records keeping purposes. The data is secured by maintaining an off-network enclave for the primary database and relying upon EPA's established network designed defense in-depth schema for protection.

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 data acquired is used to inform EPA employees, stakeholders and the public about the agency's mission and priorities via audiovisual content to produce educational, training, public information, interviews, social media and specialty features.

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.)*

Information is retrieved by date of event or project, or program.

Some of the projects do have names along with the dates of the recorded event. For example: For the administrator or deputy recordings, the project name could be "2024-02-07_ReganNAAQSSigning." Also, OM occasionally produce a personality feature on an EPA scientist, then his/her name may be used as part of the project name, such as "2024-02-05_RTPscientist-CavinHill." However, the media retrieved by focuses on the event or project, or program, not on the individual.

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?

Prior to collection of multimedia assets, project team leads in EPA programs and regions are required to obtain signed agency consent forms and/or content license agreements from individuals, to include EPA employees, who will be participating in the multimedia project via interviews, footage, photos, graphics and audio actualities. Assigned OM producers maintain and access the data to create the multimedia content to disseminate agency messages. The media assets collected are considered “fair use” and those interviewed by OM have no reasonable expectation of privacy by signing the consent form. OM limits access to its data to only authorized users of the OM system, however, OM responds to content requests received through the FOIA process, media enquiries to the Office of Public Affairs, or direct requests from the public and releases only relevant materials in relation to those requests.

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: OM employees could misuse images of individuals.

Mitigation:

OM has a limited number of audiovisual producers and support staff, who are all federal employees. They must be cleared by the OM director/system owner to have access to various key and keypad locked studios. They are all mandated to take annual agency training for cybersecurity and ethics. OM personnel are required to sign a rules of behavior statement annually. Individuals who are not part of the OM team do not have access to OM studios without an escort.

***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.

Any individual who wants to know whether this system of records contains a record about him or her, should make a written request to the Attn: Agency Privacy Officer, MC 2831T, 1200 Pennsylvania Ave., NW., Washington, D.C. 20460, privacy@epa.gov.

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?

Individuals seeking access to information in this system of records about themselves are required to provide adequate identification (e.g., driver's license, military identification card, employee badge or identification card). Additional identity verification procedures may be required, as warranted. Requests must meet the requirements of EPA regulations that implement the Privacy Act of 1974, at 40 CFR part 16.

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 described in EPA's Privacy Act regulations at 40 CFR part 16.

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: