

# 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](https://usepa.sharepoint.com/:w:/r/sites/oei_Community/OISP/Privacy/LPODoc/LPO%20Roster.docx)

<b>System Name:</b> R1 Travel Request Form (TRVLREQ)	
<b>Preparer:</b> Brenda Haslett, R1 Comptroller	<b>Office:</b> R01-MSD-CB
<b>Date:</b> 1/6/2021	<b>Phone:</b> 617-918-1357
<b>Reason for Submittal:</b> New PIA <input checked="" type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input type="checkbox"/> Rescindment <input type="checkbox"/>	
<b>This system is in the following life cycle stage(s):</b>	
Definition <input type="checkbox"/> Development/Acquisition <input type="checkbox"/> Implementation <input type="checkbox"/>	
Operation & Maintenance <input checked="" type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>	
<b>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></b>	
<b>The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <u><a href="#">OMB Circular No. A-123, Section VII (A) (pgs. 44-45).</a></u></b>	

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

The R1 Travel Request Form is a Microsoft O365 SharePoint site and is a workflow system to process official regional travel requests. The system enables EPA Region 1 staff to create travel authorization requests and the travel data collected in the system is routed to the Region 1 Comptroller’s Finance Office to prepare travel authorization (TA) and travel voucher (TV) through Concur, agency’s travel management system. The SharePoint site system’s workflows and form rules are used to remind R1 travelers to complete TV upon returning from trip. Reminders are also set to alert the Finance Office to initiate and complete the TV in Concur. The SharePoint site system facilitates the processing of official travel requests for EPA Region 1 staff and ensures consistency in travel preparation and adherence to EPA travel policies and regulations.

## **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?**

The information requested in the R1 Travel Request Form is collected pursuant to the Federal Managers' Financial Integrity Act (FMFIA) 31 U.S.C. 3511, 3512, and 3523; Travel and Transportation Reform 5 U.S.C. Chapter 57; and implementing Federal Travel Regulations (41 CFR Chapters 300-304). They contain the statutes governing travel, transportation, subsistence expenses, and allowances.

### **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?**

The R1 Travel Request Form SharePoint site operates on the Agency's Microsoft O365. The Agency's Microsoft O365 is included under the Email & Collaboration Services (ECS) and the current ATO is due to expire on December 11, 2020.

### **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?**

Yes, the R1 Travel Request Form SharePoint site operates on the Agency's Microsoft O365 and the Agency's Microsoft Government Cloud environment is FedRamp approved. Microsoft O365 is a FedRAMP approved cloud service provider and regularly undergoes reviews to ensure that all security controls are in place and operating as intended. O365 is rated as FISMA moderate based upon the type and sensitivity of data, and requires strict security and privacy controls to protect the confidentiality, integrity, and availability of the sensitive data contained in the system. It is a SaaS offering (Software-as-a-Service).

## **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 R1 Travel Request Form SharePoint site collects and maintains the following information including PII for EPA Region 1 staff requesting travel authorization and travel voucher reimbursement; (1) Traveller Name, (2) Job Title, (3) Traveller Email, (4) Office Mail Code, (5) Office Phone Number, (6) Trip Information (e.g. trip name, trip destination, trip departure and return dates, trip departure and destination airport, reservation) (7) Trip Preparer information for each travel request.

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

The information is submitted into R1 Travel Request Form SharePoint site by the EPA Region 1 traveler, approvers (traveler's supervisor), finance staff, and administrators in accordance with R1 Travel Request Form SharePoint site access permission groups, workflows and form rules.

**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. R1 Travel Request Form SharePoint site does not use information from commercial sources or publicly available.

**2.4 Discuss how accuracy of the data is ensured.**

The EPA Region 1 travellers are responsible for ensuring the accuracy of data submitted within the R1 Travel Request Form SharePoint site. The Comptroller Finance Office personnel will only alter traveller information when requested by the traveller. Because the EPA Region 1 travellers are the source of the personal information, the assumption is that the information is accurate. Once a Travel Authorization or Travel Voucher request has been submitted, it will be automatically routed to the traveller's immediate supervisor for review and approval, and then to the Comptroller Finance Office. The request will be assigned to a Comptroller Finance Office personnel who will review the data for accuracy before processing the request in Concur.

**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 privacy risk that the R1 Travel Request Form system could maintain inaccurate PII

on the users.

**Mitigation:**

The privacy risk is mitigated because the information is collected directly from the individuals requesting Travel Authorization and Travel Voucher, and at any time, the individuals are able to view, edit and/or amend their travel data to ensure accuracy and integrity.

**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?**

The R1 Travel Request Form SharePoint site resides on the Agency's Microsoft Office 365 SharePoint Online. Access to the system is restricted to internal EPA Region I employees only. Contractors do not have access to this system. Access levels are controlled by the SharePoint site access permission groups. The permission group determines the level of data access available. The R1 Travel Request Form SharePoint site has four categories of access privileges: 1) Site Visitors/Read, 2) Travel Members/Contributor, 3) Travel Owners/Full Control, and 4) EPA Region 1 Site Owner/System Administrator. The following table lists the permission levels for the R1 Travel Request Form SharePoint site on the SharePoint Server.

**TABLE 1 – R1 TRAVEL**

<b>Permission level</b>	<b>Description</b>	<b>Permissions included by default</b>
Site Visitors/ Read	Enables users to view R1 Travel records (restricted access on a need to know basis)	Limited Access permissions, plus: View Items Open Items View Versions View Pages
Travel Members/ Contributor	Enables EPA Region 1 Travellers (all EPA Region 1 employees) to manage personal travel request records; view, add, remove and update personal user information. The Travellers in this permission group can only manage their own personal travel request records and	Read permissions, plus: Add Personal Items Edit Personal Items Delete Personal Items Manage Personal Views

**TABLE 1 – R1 TRAVEL**

Permission level	Description	Permissions included by default
	<p>cannot view other traveller’s request records.</p> <p>Supervisors can view/edit to review and approve TAs and TVs requests for their staff only.</p> <p>Comptroller’s Finance Personnel can view/edit to review and process all TAs and TVs requests assigned to them.</p>	
Travel Owners/ Full Control	The Travel Owners group members; The Comptroller and designated Finance Office Personnel, can control of access permissions to the R1 Travel SharePoint site. In addition, the Travel Owners can view, add, update, delete, approve, and customize items or pages in the site.	All permissions, including: Edit/Delete permissions
Application Site Owner/ Full Control	Site Owners have full control of the R1 Travel SharePoint site. The Site Owners can view, add, update, delete, approve, and customize items or pages in the website.	All permissions, including: Edit/Delete permissions

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

As part of the R1 IT Security policy, annually during the month of October to meet NIST review requirement, the current user access and access level for the system are reviewed by the System Owner and is documented in the Regional System Inventory (RSI) system.

**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?**

Access to the system is restricted by the SharePoint Access Site Permission Groups to

internal EPA Region I users only with a current Active Directory account. Contractors do not have access to this system. Access levels are also controlled by permission member groups through the SharePoint site. The site's access permission groups determine the level of data access available as discussed above in Section 3.1.

**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.**

R1 Travel Request Form (TRVKREQ) SharePoint Site does not require a records control schedule. The system creates records that are transitory and not needed for more than 90 days. The system serves as a workflow tool to create TA and TV records in the agency travel management system; Concur. The official records are held within Concur and there is no added benefit to the agency to preserve data from the R1 Travel Request Form system.

**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 minimal privacy risk that EPA Region I may keep information in R1 Travel Request Form SharePoint site longer than the time period than required or needed.

**Mitigation:**

Only the System Owners (SharePoint Site Travel Owners Group and Site Owner Group) have the system access privilege to purge records. The record disposal is manually done by the SharePoint Site Travel Owner Group member(s) for any record over 90 days or when no longer needed for current agency business.

## **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.**

R1 Travel Request Form SharePoint site information is not 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:**

There is no privacy risk since the information is not shared outside of the agency.

**Mitigation:**

N/A.

## **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 R1 Travel Request Form SharePoint site resides on the Agency's Microsoft Office 365 SharePoint Online. The system employs technical controls, including site access permission groups with role-based access groups and audit logs, to ensure that information is used in accordance with the stated practices. Access to the system is restricted to internal EPA Region I users only and access level are also controlled by site's access permission groups. In addition, because the system may contain information protected by the Privacy Act access to the information are restricted to the EPA Region 1 user's personal travel request record(s), EPA Region 1 Comptroller's Finance Office, EPA supervisors on a need to know basis only and IT system administrator. In addition, EPA Region 1 ensure that the practices stated in this PIA are followed by leveraging training, policies, rules of behavior, and auditing and accountability.

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

The US EPA implements a Rules of Behavior (ROB) for which all users must consent prior to being granted systems credentials for access. All EPA Region 1 personnel are required to take mandatory Annual EPA Information Security and Privacy Awareness

training per CIO 2151.0 – Privacy Policy and CIO 2150.3 EPA Information Security Policy to ensure that they have sufficient understanding of proper handling and safeguarding of PII.

### **5.3 Privacy Impact Analysis: Related to Auditing and Accountability**

#### **Privacy Risk:**

There is a very low risk that individuals might access data maintained in the R1 Travel Request Form SharePoint site that they are not authorized to access and/or compromised data may not be captured if an improper audit is performed.

#### **Mitigation:**

Administrative controls, such as periodic monitoring of SharePoint site logs and accounts, help to prevent and/or discover unauthorized access and versions of compromised data. SharePoint site Audit trails are maintained and monitored to track user access and unauthorized access attempts and document version history.

In addition, annual a third-party assessment is conducted to ensure the system data controls are compliant with EPA policy and NIST 800-53.

## **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.**

R1 Travel Request Form SharePoint site maintains and uses information in order to meet current and future R1 travel requirements and needs for the purpose of recording travel information provided by the user to create travel authorizations and claim travel vouchers through the Concur as prescribed in applicable Federal travel regulations. The purpose of the collection of this information is to establish travel request records that enables Region 1 Comptroller's Finance Group to authorize, issue, and account for travel and travel reimbursements provided to individuals on official Federal government business through Concur, agency's travel management system.

### **6.2 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. Or any identifier that can be linked or is linkable to an individual.)**

As defined by the system owner, R1 Comptroller Office Finance Team, the R1 Travel Request Form SharePoint site is primary designed to retrieve information by the STATUS and AssignToName data elements by default.



Please note that the following Privacy Act System of Records Notice (SORN) apply to the information collected, stored, and retrieved by the system:

SORN Name: GSA’s Government-wide Contracted Travel Services Program or “E-Travel”

SORN Number: GSA/GOVT-4

### **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?**

The R1 Travel Request Form SharePoint site resides on the Agency's Microsoft Office 365 SharePoint Online and access to the system is restricted by the SharePoint Access Site Permission Groups to internal EPA Region I users only with a current Active Directory accounts. Microsoft Office 365 is a FedRAMP approved cloud service provider and regularly undergoes reviews to ensure that all security controls are in place and operating as intended. Office 365 is rated as FISMA moderate based upon the type and sensitivity of data, and requires strict security and privacy controls to protect the confidentiality, integrity, and availability of the sensitive data contained in the system.

In addition, the testing and annual Authority to Operate (ATO) assessment also provides a yearly evaluation on the current security posture of the Office 365 SharePoint Online and provides any vulnerabilities that maybe present and how those vulnerabilities can be mitigated in order to correct any deficiencies in terms of privacy controls.

### **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:**

There is a privacy risk that R1 Travel Request Form SharePoint site may keep information for purposes other than the purpose for which it was collected.

#### **Mitigation:**

Appropriate safeguards and controls designed to limit access and use of the data stored therein. The site’s access permission groups determine the level of data access available as discussed above in Section 3.1.

**\*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](mailto: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?**

Participation in the R1 Travel Request Form SharePoint site system is completely voluntary, and employees can opt-out of the program at any time.

**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:**

There is a privacy risk that the Notice may not provide enough information for the individuals to understand the full uses of their information.

**Mitigation:**

The ConcurGov Privacy Act Notice and any Rules of Behavior notices displayed on the ConcurGov website page ensure that the collection notice provide adequate information for individuals to understand all of the uses for the collection. The SORN, GSA/GOVT-4, also provides general notice of the purpose of collection, redress procedures, and the routine uses associated with the collection of the information.

## **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?**

All individuals participating in the R1 Travel Request Form SharePoint site may access the system to view and update their own information at any time to ensure it is accurate, relevant, and timely information is maintained within the system.

## **8.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?**

All individuals participating in the R1 Travel Request Form SharePoint site may access and correct inaccurate information in the system directly and at any time. Also, individuals can contact the appropriate Travel Preparer assigned for any questions or assistance.

## **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:**

As outlined in Section 8.1 above, any user has the ability to access and correct inaccurate information in the system directly and at any time. Also, individuals can contact the appropriate Travel Preparer assigned for any questions or assistance.

### **Mitigation:**

There is no privacy risk related to redress because individuals have access to correct information directly in the R1 Travel Request Form SharePoint site at any time and may also contact the Travel Preparer for any inquiries regarding correction of the inaccurate information or for any assistance.