



# 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: OPEEE Salesforce Module</b>	<b>System Owner: Hiram L. Tanner III</b>
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<b>Date: 4/6/2021</b>	<b>Phone: 202-564-9483 (Karen)</b>
<b>Reason for Submittal: New PIA</b> <input checked="" type="checkbox"/> <b>Revised PIA</b> <input type="checkbox"/> <b>Annual Review</b> <input type="checkbox"/> <b>Rescindment</b> <input type="checkbox"/>	
Privacy Threshold Analysis (PTA) for module / tenant client within existing OCSPP Salesforce system for which there is an existing PIA. The OCSPP Salesforce system governance policy requires that all modules submit a PTA / maintain their own PIA – this is the reason for this submission.	
<b>This system is in the following life cycle stage(s):</b>	
Definition <input type="checkbox"/> Development/Acquisition <input checked="" type="checkbox"/> Implementation <input checked="" 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><a href="#">OMB Circular A-130, Appendix 1, Section (c) (1) (a-f)</a></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 OPEEE Salesforce module was built within the OCSPP Salesforce System and currently meets two business needs:

- (1) Record basic information about awarded Environmental Education (EE) grants and track the project results of these awarded grants in terms of the Office of Environmental Education’s (OEE) specific goals for this program.
- (2) Record President’s Environmental Youth Award (PEYA) applicants, support the screening of applicant

eligibility, support the substantive review of applications by EPA, track applicant status, and support coordination of the PEYA annual awards ceremony.

Currently, all information in the system is hand entered by EPA staff. OPEEE is planning an implementation of a Salesforce Community which would allow EE grant recipient representative and PEYA applicant sponsors to enter their information directly.

## **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?**

EPA established the PEYA program to meet the requirements of Section 8(d) of the National Environmental Education Act (20 U.S.C. 5507(d))

Section 6 of the National Environmental Education Act of 1990 (Public Law 101-619) authorizes the award of Environmental Education Grants by EPA. Separately, the authority to gather progress performance for assistantship programs is derived from 2 CFR Part 200, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.”

### **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, the OPEEE Salesforce module resides within the OCSPP Salesforce system as a tenant client and inherits all security controls from the OCSPP Salesforce system. OPEEE operates its module, including development and O&M, per OCSPP Salesforce governance policies. OCSPP Salesforce has a FISMA Moderate ATO. OPEEE is not involved the maintenance of OCSPP’s Salesforce’s ATO. The ATO will expire on April 13, 2023.

### **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.**

OPEEE’s President’s Environmental Youth Award (PEYA) is covered under EPA ICR No. 2524.03, OMB Control No. 2090-0031.

OPEEE’s Environmental Education (EE) Grants program has not had a defined format for its progress and final reports. Reports have been submitted as required per EPA grant general terms and conditions. However, a defined form is being drafted and an ICR pursued. The EE Grants ICR, once finalized, is not expected to add PII data elements but instead ensure that EE Grant results are being reported in a unified format across all award recipients.

**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?**

Data is maintained in the OCSPP Salesforce system, which uses Salesforce's Federal government dedicated servers based in North America per FedRAMP requirements. The Salesforce products which the OCSPP Salesforce system uses are a FedRamp approved SaaS.

**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).**

**Contact object (Shared standard object within OCSPP Salesforce; used by both PEYA and EE Grants)**

PEYA applicant sponsor (teacher) name / Grant recipient representative name  
Email address  
Office / organizational mailing address

**Applicant object (Custom object for OPEEE module - PEYA)**

PEYA applicant name

**Files (Shared standard object within OCSPP Salesforce; used by both PEYA and EE Grants)**

PEYA applicant sponsor name / Grant recipient representative name  
Email address  
Office / organizational mailing address  
PEYA applicant name  
PEYA applicant parent name (program participation permission slips and media release form.)

NOTE: Due to EPA business need to have the grant final report exist as a file for recordkeeping purposes, even with the implementation of a Community and enhanced EE grant progress and final report capabilities, these reports may still exist at least be able to be exported as files that would contain Grant recipient representative name, Email address, Office / organizational mailing address.

PEYA applicants are encouraged not to use any PII if possible in their project descriptions. The PEYA application currently exists as a PDF which combines PII elements, project description, permission slip and media release form. With the planned enhancements to the PEYA process using a Community, PII will be stripped or masked from the application form and EPA staff reviewers only provided with project descriptions and other information relevant to their reviews. With the planned enhancements to the PEYA process using a Community, permission slip and media release will continue to be signed offline and submitted by the teacher sponsor but they will be separated from the application form as there is no reason for EPA staff reviewers to have this information.

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

Currently, information is hand-entered by EPA staff. Data is received on paper and via email from grant recipients and PEYA applicants.

The planned change and the reason for the PTA is OPEEE plans to implement a Salesforce Community (portal) to allow its grant recipients to report their own progress data and for education professionals to submit student award applications for which they are sponsors.

## **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.**

Accuracy of the data is maintained by EPA headquarters and Regional staff following up with EE grantees and PEYA applicants. Regional staff are the Project Officers for the EE grants.

## **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:**

The current PEYA application process prevents a privacy risk because its not uncommon for parents or even older students to email applications. These emails are not retained in the OPEEE Salesforce module, but regardless it is concerning to even receive them via EPA mail. Also, the current

PDF application combines PII elements with other elements relevant to EPA staff reviewers. EPA staff reviewers are privy to PII elements not relevant to their reviews.

**Mitigation:**

The implementation of a Community for PEYA would enable better enforcement of the program's policy that PEYA applications are submitted by teacher sponsors and correspondence is with those sponsors' work contact information. It would also enable PII elements to be masked from or otherwise not provided to EPA staff reviewers.

### **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, the OPEEE Salesforce module resides within the OCSPP Salesforce system and inherits all security controls from the OCSPP Salesforce system. OPEEE further operates its module, including development and O&M, per OCSPP Salesforce governance policies. OPEEE staff do not have any ability to change security-related controls in the system.

OPEEE is not involved the maintenance of OCSPP's Salesforce FISMA Moderate ATO and is not privy to its security plan documentation; the current system profiles for OPEEE were established by the contractor which supports all OCSPP Salesforce security, governance, and development. All current users of the OPEEE module are EPA staff.

For the proposed Community, the contractor identified security plan artifacts needing minor updates and is presumably currently pursuing those for the WIFIA Community which is being developed in the OCSPP Salesforce system. For the proposed Community, all users would be authenticated and accessed approved by the OPEEE system owner. These users would have predefined profiles established by the contractor for OPEEE grant recipient and OPEEE PEYA sponsor. EE grant Community user access would be revoked upon submission of grant project final report. PEYA Community user access would be revoked upon completion of the annual awards cycle.

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

OCSPP Salesforce security plan and related artifacts.

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

Yes, but these are unrelated to OPEEE's module. There are multiple modules implemented on the OCSPP Salesforce system for other EPA programmatic needs.

### **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?**

An EPA contractor which supports the production maintenance of the OCSPP Salesforce system has access to the data. OPEEE does not hold the contract(s) under which this contractor works – which is both an OCSPP contract vehicle and EPA Working Capital Fund. However, both contracts have the appropriate clauses.

### **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.**

The applicable EPA records schedule for EE grants progress and final reports is schedule 1003. (NARA disposal authority DAA-0412-2013-0008-0002) The OPEEE Salesforce module is intended for the post-award tracking of EE grants in terms of grant project accomplishments. It is not intended to duplicate or replace grants management functionality in NGGS and other OGD tracking systems, and is therefore not a recordkeeping system for EE grants. In practice, however, there is no intention to delete EE grants data from the OPEEE Salesforce module so that OPEEE has a single repository from which to report the results of its EE grants program. With the planned implementation of the Community, individual grant recipient's access would be revoked upon submission of a final report or if the grant recipient indicates a need to replace the staff member who was provisioned access.

The applicable EPA records schedule for PEYA applications is schedule 1035 (NARA disposal authority DAA-0412-2013-0021-0003). Historically, OPEEE has not retained information on PEYA applicants in the long term other than the brief project description of past winners on the EPA website. Unlike the EE grants program, there has been no reporting of the aggregate results of the program over its lifetime and there are no current plans for this.

### **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.*

The OCSPP Salesforce system is maintained with privileged access and with further protections such as Salesforce Shield, which provides system monitoring and data encryption. No actions are performed in the system without authentication, and an audit trail of all logins and actions in the system are produced automatically. We see no privacy concerns related to retention.

**Privacy Risk:**

**Mitigation:**

## **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 data is currently shared directly from the system outside EPA. Data received in the system, such as project summaries, are revised and posted to the EPA website or used for award ceremony programs. Aggregate data about OPEEE's grants program is taken from the system and used for reports.

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

Not applicable. No data is currently shared directly from the system outside EPA. Nor is this currently scoped for the planned Community.

**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?**

Not applicable. No data is currently shared directly from the system outside EPA. Nor is this currently scoped for the planned Community.

**4.4 Does the agreement place limitations on re-dissemination?**

Not applicable. No data is currently shared directly from the system outside EPA. Nor is this currently scoped for the planned Community.

## **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:**

### **Mitigation:**

## **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 OCSPP Salesforce system is maintained with privileged access and with further protections such as Salesforce Shield, which provides system monitoring and data encryption. No actions are performed in the system without authentication, and an audit trail of all logins and actions in the system are produced automatically.

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

All EPA staff users and contractors complete EPA annual privacy training.

Proposed Community users would not have access to any data but their own. Proposed Community users would be asked to sign the OCSPP Salesforce user agreement.

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

### **Privacy Risk:**

### **Mitigation:**

## **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 OPEEE Salesforce module currently meets two business needs:

- (1) Track the project results of awarded EPA Environmental Education grants in terms of the Office of Environmental Education's (OEE) specific goals for this program.
- (2) Record President's Environmental Youth Award (PEYA) applicants, support the screening of applicant eligibility, support the substantive review of applications by EPA, track applicant status, and support coordination of the PEYA annual awards ceremony.

**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.)*

**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 OCSPP Salesforce system is maintained with privileged access and with further protections such as Salesforce Shield, which provides system monitoring and data encryption. No actions are performed in the system without authentication, and an audit trail of all logins and actions in the system are produced automatically. This information has been collected by years via email and paper by the same small group of EPA staff that now have access to the OPEEE Salesforce module. The OPEEE Salesforce module and the planned Community should actually improve protection of PII data as it will be less likely to be lying around on paper, downloaded on hard drives or onto non-secure share drives, and in EPA programmatic inboxes.

**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:**

**Mitigation:**

**\*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?**

### **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:**