



# 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>  Region 2 Telework Database	<b>System Owner:</b>  Alexida Perez
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<b>Date:</b>  January 1 2024	<b>Phone:</b>  212-637-3327
<b>Reason for Submittal:</b> New PIA <input type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input checked="" 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:</b> 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>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:**

Region 2 Telework Program is to manage telework applications for R2 employees. Telework is a voluntary program and not an employee entitlement. The operational needs of the agency are paramount. Employees who telework do not have an automatic right to continue teleworking. Telework agreements may be modified, adjusted or terminated at any time by management based upon an employee’s failure to adhere to telework requirements or based upon any other consideration affecting employee eligibility.

## 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 Telework Enhancement Act of 2010 (December 9, 2010); Public Law 111–292.

- 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. June 1, 2026

- 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 Applicable

- 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?**

Not Applicable

## 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).**

Employee Name • Employee Home Address(es)/Telework Location(s) • Employee Personal Phone Number • Type of Telework Agreement • Date of Signature/Activation • Date of Telework Training (if applicable) • Date of Expiration (if applicable) • Allowable Generic of Days of the Week an employee May use AWL (if applicable)

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

- 2.3** Data collection is initiated at the individual employee level (people) with a printed and signed form. Eventually the paper form will be converted to electronic form with digital signature. Telework is a voluntary program, and employees must apply for it.

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

No

- 2.5 Discuss how accuracy of the data is ensured.**

Expiration dates – if applicable – are included in the telework agreements and will be tracked based on compliance with internal EPA policy. Human Resources staff will use expiration dates to reach out to employees to determine if another telework agreement is needed. Re-certification is required every 12 months.

## **2.6 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 risk associated with data not being accurate.

**Mitigation:** Individual telework agreements must be renewed every 12 months. The employee agrees to meet with his/her supervisor at least annually to discuss his/her telework arrangement to determine if he/she remains eligible to continue participating in the EPA Telework Program.

## **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. System access rights will be limited. Employees and supervisors will have limited access to the information. Employees are able to input data for each telework application; supervisors are able to read (not change the data associated with each telework application. Access to the database is limited to system administrators and select Human Resource personnel (as designated by the HR branch chief). Dual authentication (PIV card and LAN ID login) are required for all system users. The database will be maintained on a local, Region 2 server that adheres to all of EPA's security requirements.

### **3.2 What procedures are in place to determine which users may access the information and how does the system determine who has access?**

Dual authentication (PIV card and LAN ID login) are required for all system users.

### **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?**

Only internal, EPA staff will have access rights to the information. Select Human Resources staff and system administrators in Region 2 will have full access rights (managed through roles and access controls). Limited non-Human Resources staff in Region 2 will have access to non-PII information in the system.

**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 records schedule is 0039, Alternative Worksite Records (final 12/31/2013). This falls under NARA's general record schedule 1/42.

**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:** The risk of having information retained beyond the length of time required.

**Mitigation:** Region 2 has a Record Management Policy in place. Record control schedule is followed.

## **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

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

Not Applicable

**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

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

Not Applicable

**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:** None. There is no information sharing.

**Mitigation:** None

## 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 in accordance with stated practices in this PIA?

The use of the data is relevant because it will ensure that all teleworking employees have completed the required paperwork and have received the required authorizations to telework.

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

R2 Computer users are required to take the Information Security and Privacy training annually

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

**Privacy Risk**: The risk of the information not used in accordance with what stated in the PIA.

**Mitigation**: Supervisors are required to review and verify the telework information is accurate and used relevant to the collection.

## 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 information is for internal, Region 2 use only. The information will be used by Human Resources for tracking purposes such as:

- Identification of the most current telework agreement(s) in place (i.e. employee can have multiple types of agreements for multiple workplace locations);
- Notification to employees of expiring or obsolete agreements; and,

### 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.)*

Primarily by the applicant's name

### 6.3 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the

**information?**

SORN EPA-61

#### **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:** The risk that information is not handled in accordance with the uses describe above.

**Mitigation:** Supervisors of the employees participating in this program are required to review and approve the telework information

**\*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.**

Employees can decline to provide information if they do not want to participate in telework. However, employees are required by the Telework Agreement to provide the information or they cannot participate in the voluntary program.

#### **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?**

Employees can decline to provide information if they do not want to participate in telework. However, employees are required by the Telework Agreement to provide the information or they cannot participate in the voluntary program.

#### **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:** The risks of insufficient notice and opportunity to decline or consent.

**Mitigation:** Privacy statement is posted at the point of collection to provide users an opportunity to decline or consent.

## **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 are required to have their Telework Agreements re-certified on at least an annual basis. Also, when changes in the employee's alternate work location (AWL) occur, employees must notify their supervisors and Telework Coordinators so that their files can be updated.

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

Individuals are required to have their Telework Agreements re-certified on at least an annual basis. Also, when changes in the employee's alternate work location (AWL) occur, employees must notify their supervisors and Telework Coordinators so that their files can be updated.

### **8.3 How does the system notify individuals about the procedures for correcting their information?**

Individuals are required to have their Telework Agreements re-certified on at least an annual basis. Also, when changes in the employee's alternate work location (AWL) occur, employees must notify their supervisors and Telework Coordinators so that their files can be updated.

### **8.4 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:** The risk associated with the lack of opportunity for the individual to correct inaccurate information

**Mitigation:** Employees participating in this program are allowed to access the system to correct any erroneous information.