

# 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: Online Library System (OLS)</b>	
<b>Preparer: Jim Mitchell, Shari Clayman (New System Owner POC), Nannette Willis, ISSO</b>	<b>Office: OMS-OEIP-LAD</b>
<b>Date: 05/1/2021</b>	<b>Phone: 919.541.5559</b>
<b>Reason for Submittal: New PIA _____ Revised PIA <u>X</u> Annual Review <u>X</u> Rescindment _____</b>	
<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 Online Library System (OLS) is data management system that allows authorized EPA library users to collect, store, retrieve and edit data pertaining to materials held by Environmental Protection Agency (EPA) libraries. OLS is made up of several modules that are accessed only by Authorized Library Employees, which includes both Federal and contractor staff. One of these modules (Circulation) is used to register an EPA employee or contractor in the event that they wish to borrow materials held in an EPA library collection. The Circulation Module is the only portion of OLS that uses PII of the same type as that held in the EPA Locator.

## **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?**

In 1971, Howard Messner, Deputy Assistant Administrator for Administration, signed EPA Order No. 1300.1, "Library Services setting up the Network," which outlined the development of an Agency-wide library system with a coordinated approach to library systems planning and operations. EPA's library system was designed to support staff in the program and regional offices and provide them with access to environmental information. The Network develops, maintains, and/or manages online tools to facilitate library operations and provides access to information resources for EPA staff and the public. Tools include the Online Library System (OLS), EPA's online catalog of bibliographic records of the collections in Network libraries, available on the Internet to EPA employees and the public.

OMB Circular A-130, Management of Federal Information Resources, Sections 8 and 9  
Privacy Act of 1974, 5 U.S.C. 552a(b)(11).

Records Management by Federal Agencies 44 U.S.C. 3101

Departmental Regulations 5 U.S.C. 301.

The Freedom of Information Act PL, 93-502

### **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. May 13, 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.**

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 Circulation module within OLS helps each of EPA's 23 libraries to track the library materials that are checked out to EPA employees and contractors from their locations. The module is comprised of Circulation data and Patron data. Circulation data consists of descriptive information about library materials (books, journals, etc.). Patron data consists of fields such as EPA employee or EPA contractor name, work address, work email address, office, office phone number, and project officer (for contractors). Only authorized library employees (federal and contractor) have access to the Circulation module and the data housed therein after signing into a maintenance area on the system using LAN ID and password. The data is accessed by the authorized library employees who only have access to the patron data input by their single location.

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

Authorized library employees manually enter information for patron data into the Circulation module based on verbal communication with the EPA employee or contractor wishing to borrow materials. This is done for the first time when a library user physically enters the library location and wishes to borrow an item from the collection. The library user shows their EPA badge prior to the authorized library employee entering their information into the module. The information remains in the system in order to maintain an inventory of materials that are checked out to library users from EPA libraries.

### **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.**

Each authorized library employee is responsible for ensuring accuracy of patron data that they enter. The authorized library employee sees both the library user's badge and they may check the patron data against the EPA Locator.

### **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 risk is that patron data entered by the authorized library employee may be inaccurate.

**Mitigation:**

The following mitigation strategy is defined in Control DI-1 from the OLS Security Plan document. Each authorized library employee will utilize multiple opportunities to validate the accuracy of Library patron data that they enter by requesting that each individual patron reconfirm their personal data at registration, accounts review or when checking out an item. The authorized library employee sees both the library user's badge and they may check the patron data against the EPA Locator.

**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 OLS system does have access control levels within the system to prevent authorized users from accessing information that they do not need to know

The OLS Administrator employs ORACLE roles to enforce two access control levels

- OLS Admin level – allows the OLS Administrator to view and maintain record information concerning patrons from the entirety of the EPA Library network
- Librarian Authorized Users – allows each authorized library user to view and maintain record information concerning patrons registered only in their local library. These authorized library users cannot view or edit patron record information from any other library

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

This policy is identified within the OLS Security Plan document under security controls AC-2 and CM-7

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

The OLS Database Administrator has access to all information in the system.

Authorized library employees, whom for the most part are EPA contractors have access to the data/information in the system, but only information created by and pertaining to their library location.

### **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?**

Federal Acquisition Regulations (FAR) clauses are included in the various library services contracts throughout the agency.

The OLS administrator and EPA library authorized users will have access to the OLS Circulation module. Most of these users are contractors. Their associated contracts comply with the FAR.

### **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 library user's Locator type information is stored in the Circulation module in order for the library user to continue to borrow materials from the library throughout their employment at EPA. Library users remain in the system until they are manually deleted by an authorized library employee. Typically, employee separation procedures have a requirement to verify that departing EPA employees do not have library materials in their possession. When the library receives a clearance request and verifies that the employee does not have any library materials, they are manually deleted from the system. In the event that a library user does not go through the clearance process, the individual libraries may wish to periodically check the Locator.

EPA Records Control Schedule: 0088

### **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:**

In the event that a library user is no longer employed by EPA as either a federal or contractor employee, there is a chance that their Locator-type information remains in the Circulation module.

#### **Mitigation:**

In order for EPA employees to leave the agency the supervisory librarian from the Headquarters Library must certify that the employee has no materials checked out from any EPA library. The OLS administrator will confirm this along with confirming that the patron record for the EPA employee has been permanently removed.

There is no such official certification for contractors. However, the OLS system will notify each library when patrons have been inactive for over a year. This serves as a strong recommendation for the patron to be removed from the OLS system

## **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.**

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?**

Patron record information is not shared by organizations either inside or outside of EPA.

### **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 as patron information is not shared with other organizations.

**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 as stated in Section 6.1?**

**The library patron information entered in the OLS Circulation module is limited to the Routine Uses outlined in SORN EPA-82. The Oracle Access Management system safeguards access by only allowing the OLS DBA and authorized library employees to have access to patron Locator-type data. The OLS Administrator has further restricted access for authorized library users to just the individual patron records attached to the EPA library in which they work. All authorized users of the OLS Circulation module must take Privacy Awareness training annually and are required to report all suspected or known breaches of all PII to the OLS Database Administrator and to the EPA Call Center.**

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

Annual EPA Information Security and Privacy Awareness Training is required of all authorized library employees.

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

**Privacy Risk:**

There is a very low risk of unaccountable data. If there were no safeguards or security measures, then OLS might present a privacy risk.

**Mitigation:**

All the information provided by individual patrons to EPA libraries is already available in the EPA locator. Access to this information within the OLS Circulation system has been restricted to users who have been authorized access through the ORACLE Access Manager. These users

must supply their LAN User ID and password to access the information. Further, authorized library users' access is restricted to only individual patron information created by their own library.

## **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.**

Public information in the National Catalog is used by the public for their information and includes records of holdings in EPA libraries. Other modules are restricted to authorized users only. Patron data is used by the librarians to track library items that are borrowed from the EPA library collection. It allows the authorized library employee to assign a due date for the borrowed materials so that the library user knows when to return the materials to the library.

### **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.)**

The authorized library employee logs into the OLS maintenance module using their LAN credentials, and searches for the library user's name in order to see a list of the materials the user has borrowed from the library. The OLS circulation system is designed to retrieve circulation information by the individual user's name, and this is done only by an authorized user when a patron is checking out library material. The National Library Catalog does not contain PII; EPA and public users can only view bibliographic records of library holdings in the catalog.

### **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?**

EPA locator data for library users, including name, office email and/or office phone number, comprise the data that EPA libraries collect from individual patrons. Access to the data is restricted to authorized library employees and is used by the EPA libraries to track circulated materials that their library is responsible for. To access the OLS Circulation system, both the OLS Administrator and the Authorized library users must provide a LAN User ID and password. The OLS Administrator has further restricted access for authorized library employees to just the individual patron records created by the EPA library in which they work.



## **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.*

The OLS administrator authorizes users by adding their LAN usernames to the OLS Library account within the Oracle Identity Database. This action is performed using the Oracle Access Manager (OAM) tool. The authorized library employees can then access the OLS maintenance modules unique to their single location through ORACLE WEBGATE which will authenticate their provided LAN ID and password. There is no public or library user access to the information housed in the Circulation module.

### **Privacy Risk:**

There is the risk that the information provided by individual patrons to the EPA libraries will not be used as described above.

### **Mitigation:**

All the information provided by individual patrons to EPA libraries is available in the EPA locator. Access to this information within the OLS Circulation system has been restricted to users who have been authorized access through the ORACLE Access Manager. These users must supply a LAN User ID and password to access the information. Further, authorized library users' access is restricted to individual patron information created by their own library.

**\*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).

When a library user physically enters an EPA library location and wishes to borrow an item, the authorized library employee communicates verbally that in order to borrow a book, they need to have a patron record in the Circulation module. Only an authorized

library employee can access the system and input data.

## **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?**

Individuals consent to provide their information when they check out items from a library. They can decline to provide personal information by simply not checking items out from the library. Since, the only patron data collected is that which is also in the EPA Locator, library users do not opt out of providing that 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:**

There is a risk that notice is not provided to give individuals a chance to consent to uses of information or decline to provide or opt out of sharing information.

### **Mitigation:**

There are no examples in which a library user declined to provide the authorized library employee with their work-related patron data therefore no mitigation efforts have been required. To check out materials from an EPA library, an individual must stop at the library's circulation desk. An authorized librarian will explain to the individual that they must provide their name, email address and/or phone number, to check out materials. This personal information allows the library to track circulated materials. The individual can then opt out of providing this information by not checking out the library materials. If they do decide to provide their information there is no added risk, since that information is already available in the EPA locator. There is adequate notice in place prior to information collection.

## **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.

Library users do not have direct access to their information.

## **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.

Individuals do not have access to their records. In the case of a change to any of the patron's details, the patron would notify the library and it would be a manual process completed by an authorized library employee. Alternatively, upon borrowing an item from the library, the authorized library employee would verify the information verbally.

## **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:**

There is a risk involved if the individual cannot access their information or correct inaccurate or erroneous information using the process afforded under the Privacy Act and FOIA as described above.

### **Mitigation:**

To mitigate this risk the individual who has checked out items from an EPA library and provided required personal information can access or correct any inaccurate information by contacting the EPA library in which the library check outs occurred. The authorized library user can then show the individual their identifying record information and then implement requested changes.