

PRIVACY IMPACT ASSESSMENT

Please submit your responses to your Liaison Privacy Official
http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf. If you need further assistance contact privacy@epa.gov.

System Name: Region 9 Enterprise General Support System (GSS)		
Preparer: Darnell Baker	Office: EPA Region 9\EMD\Computer Operations	
Date: 3/15/2024	Phone: 415-972-3220	
Reason for Submittal: New PIA _____ Revised PIA _____ Annual Review _____ x _____		
This system is in the following life cycle stage(s):		
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>	Implementation <input checked="" type="checkbox"/>
Operation & Maintenance <input checked="" type="checkbox"/>	Rescindment/Decommissioned <input type="checkbox"/>	
<p>Note: 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>.</p> <p>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>.</p>		

Provide a general description/overview of the system:

The Region 9 Enterprise GSS, also known as the Region 9 LAN, is an EPA General Support System. The Region 9 Enterprise General Support System (GSS) is a set of systems that provides services and functionality to the Region 9 community in the United States (US) location in support of the Region 9 EPA Mission. These IT services and functionality include: data transport, workstation computing, analytical equipment, email, eDiscovery and FOIA, file and print, database, storage capacity, intranet web services, general IT services in support Region 9 development, data management, and analysis, and user support.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the system in question?

This system does not collect PII, it stores PII collected under these federal authorities

Resource Conservation and Recovery Act, 42 U.S.C.6981; Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9660; Clean Air Act, 42 U.S.C. 7403; Safe Drinking Water Act, 42 U.S.C. 300j-1; Federal Water Pollution Control Act, 33 U.S.C. 1254; Toxic Substances Control Act, 15 U.S.C. 2609; Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. 136r. Federal Grant and Cooperative Agreement Act, 31 U.S.C.6301 et seq.; Public Health Service Act, 42 U.S.C. 241 et seq.; Solid Waste Disposal Act, 42 U.S.C. 6901 et seq.; Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. 9660. Other laws may be relevant as well.

1.2 Has a system security plan been completed for the information system(s) supporting the system?

Yes, a system security plan has been completed for the information system supporting scientific research efforts/data collections.

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 is required.

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 use, dissemination, and maintenance of the PII data elements/information collected is managed by Region 9 personnel for Regional use and support in all aspects of Regional functionality. These efforts are covered under SORN 34 and 36. PII elements are identified under each individual research study or effort covered by these SORNs. PII data elements (medical, name, SSN, DOB, Contact Info, address, and telephone number) are not collected by the Region 9 Enterprise GSS, but can be stored on servers or desktops covered by the Region 9 GSS SSP.

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

The Region 9 GSS System SSP does not identify each system, these systems are tracked by the various Regional workgroups and offices for Regional organization and collecting the data. The collection of this data is not completed through a specific application but is typically provided to Region 9 offices and groups in a data file. These data files are stored

on servers and desktops covered under the Region 9 Enterprise GSS SSP.

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

The Region 9 Enterprise GSS does not use this information, the system takes no action on the information. The system is used to store the information in electronic data files.

2.4 Discuss how accuracy of the data is ensured.

The accuracy of the data is ensured through and by each office's Quality Assurance Plans and actions. Quality Assurance (QA) /Quality Control (QC) processes; personnel are responsible for each system and process and the data collected. The Region 9 Enterprise GSS is only utilized to store the information collected. Region 9 Enterprise GSS IT components/systems reside on the EPA Intranet, and are not publicly available or accessible from the Internet.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk:

The risks associated with storing this information within the Region 9 Enterprise GSS will be addressed through the application of Risk Management Framework (RMF) SP 800-39.

Mitigation:

Implementing the Risk Management Framework (RMF) SP 800-39 which includes categorization of the system via FIPS 199 and selection of NIST 800-53 control set, implementing the required controls, assessing the system annually, authorizing and monitoring the system.

Section 3.0 Uses of the Information

The following questions require a clear description of the system's use of information.

3.1 Describe how and why the system uses the information.

The system does not use the information. The information is stored on the Region 9 managed system: desktop hard drives and file servers. Enterprise GSS reside on the Intranet and are not publicly available or accessible from the Internet.

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.)

The Region 9 Ent. GSS (system) does not retrieve information. The information is collected manually by the

Region 9 community and stored in electronic data files on Region 9 Ent. GSS servers and desktops.

If the system retrieves information by personal identifier, what types/elements of information about the user are being retrieved?

Not applicable.

3.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

SORN 34 and 36 apply to specific Region 9 efforts that collect and utilize PII, the information collected is stored on a Region 9 Enterprise GSS desktops and servers. SORN 34 and 36 do not apply to the entire Region 9 Enterprise GSS but to collection efforts by the Region 9 personnel. The data collected by them then stored on enterprise GSS systems.

3.3 Does the system use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how EPA plans to use such results.

The Region 9 Enterprise GSS system permits electronic storage of PII data, but do not conduct electronic searches, queries, or analysis. Analysis of flat data files (i.e. excel) is conducted by the Region using tools or queries (i.e. R statistical software on a desktop).

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk:

1. Unauthorized access.
2. Data Loss.

Mitigation:

1. Active Directory / Access controls on desktops, servers, file shares. The Region 9 Enterprise GSS systems resides on the Intranet and the data is not publicly available, or accessible via the Internet
2. Individuals are responsible for backing up the data to the Region 9 Net MyDocs if the data is placed /used on a desktop. Region 9 File Server shares are backed up via enterprise backup methods, unless explicitly excepted from this process.

Section 4.0 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.

4.1 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, who wants access to his or her record, or who wants to contest the contents of a record, should make a written request to the Agency Privacy Officer, 1200 Pennsylvania Ave. NW, Washington DC 20460.

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?

Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete EPA Privacy Act procedures are set out in 40 CFR Part 16. Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete EPA Privacy Act procedures are set out in 40 CFR Part 16.

4.2 Privacy Impact Analysis: Related to Notice

Privacy Risk:

None

Mitigation:

None

Section 5.0 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.

5.1 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?

Users authenticate to Region 9 desktops and servers using Active Directory (user id/Passwords). There are designated system administrators and researchers/scientists are granted access to their files/folders on a need to know basis, credentials through their AD role (user, administrator). AD is utilized to control access to the Region 9 File server shares where this information may be stored. Enterprise GSS systems reside on the Intranet and are not publicly available or accessible from the Internet.

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

The rights for each user are assigned through Active Directory (user/admin). The Enterprise GSS systems reside on the Intranet and are not publicly available or accessible from the Internet.

5.3 Who (*internal and external parties*) will have access to the data/information in the system? If contractors, are the Federal Acquisition Regulations (FAR) clauses included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)?

Only the individuals selected to participate and oversee the particular information will have access to the data/information.

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

Region 9 uses Active Directory to manage individual user accounts for Region 9 managed servers and desktops. Only the individuals selected to participate and/or oversee the study will have access to the applicable study data/information stored on the Region 9 Enterprise GSS systems. Region 9 federal and contractor staff are selected by the Primary Investigator (PI)/Researcher, Individuals must take appropriate PII training and review PII agreements. Access is only granted based on position responsibilities and a need to know. The Enterprise GSS systems reside on the Intranet and are not publicly available or accessible from the Internet.

5.5 Explain how long and for what reason the information is retained. Does the system have an EPA Records Control Schedule? If so, provide the schedule number.

SORN 36 RCS EPA 1004, and the Region 9 Privacy Liaison Official and Region 9 Records Liaison Officer are working to determine a Record Control schedule for SORN 34.

EPA Records Schedule 0090 - Administrative Support Databases

<http://intranet.epa.gov/records/schedule/final/0090.html>

EPA Records Schedule 1006 - Administrative Management

<http://intranet.epa.gov/records/schedule/final/1006.html>

EPA Records Schedule 1012 - Information and Technology Management

<http://intranet.epa.gov/records/schedule/final/1012.html>

5.6 Does the systems retention schedule approved by the National Archives and Records Administration (NARA) exist?

Yes, Region 9 staff use NARA retention schedule. Every research study falls under a Lab, Center or Office that has an assigned Records Liaison Officer (RLO) who assist the researcher with determining the appropriate record schedule.

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EPA Records Schedule 1012 - Information and Technology Management

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5.7 Does the system Privacy Impact Analysis: Related to Retention

Privacy Risk:

Managed by Region 9 Lab/Center/Office Records Liaison Officer (RLO).

Mitigation:

Managed by Region 9 Lab/Center/Office Records Liaison Officer (RLO).

Section 6.0 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.

6.1 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.

All Regional work is conducted and managed by the staff. PII is not shared, however the results of the analysis may be. The Enterprise GSS systems reside on the Intranet and are not publicly available, are not accessible via the Internet, and only store the information collected by the staff.

6.2 Describe how the external sharing noted in 6.1 is compatible with the original purposes of collection in the SORN noted in 3.4.

Each research study is conducted and managed by the researcher. PII is not shared, however the results of the analysis may be. The Enterprise GSS systems reside on the Intranet and are not publicly available, are not accessible from the Internet, and only store the information collected by the staff. The Region 9 Enterprise GSS does not share this

information. See SORNs 34 and 36 for detail.

6.3 Does the agreement place limitations on re-dissemination?

Not applicable.

6.4 Describe how the system maintains a record of any disclosures outside of the Agency.

Not applicable.

6.5 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.

6.6 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk:

None. The Region 9 Enterprise GSS systems do not share information.

Mitigation:

None. The Region 9 Enterprise GSS systems do not share information.

Section 7.0 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.

7.1 What are the procedures that allow individuals to access their information?

Requesters will be required to provide adequate identification, such as a driver's license, employee identification card, or other identifying document. Additional identification procedures may be required in some instances.

7.2 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 set out in 40 CFR Part

16.

7.3 How does the system notify individuals about the procedures for correcting their information?

Any individual who wants to know whether this system of records contains a record about him or her, who wants access to his or her record, or who wants to contest the contents of a record, should make a written request to the Agency Privacy Officer, 1200 Pennsylvania Ave. NW, Washington DC 20460.

Privacy Impact Analysis: Related to Redress

None. The Region 9 Enterprise GSS is only used to store the data.

Mitigation:

None. The Region 9 Enterprise GSS is only used to store the data.

Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy-based safeguards and security measures.

8.1 How does the system ensure that the information is used in accordance with stated practices in this PIA?

The user is responsible for ensuring the correctness, accuracy, and use of the data in accordance with PIA practices. The Region 9 Enterprise GSS is only used to store the data.

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

Annual Information Security Awareness and Privacy Training is required for all EPA federal, contractor, other staff. Region 9 Privacy training for those who handle PII.

8.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

The Region 9 Enterprise GSS is only used to store the data.

Mitigation:

The Region 9 Enterprise GSS is only used to store the data.