

PRIVACY IMPACT ASSESSMENT

Submit in *Word format* electronically to: Linda Person
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Office of Environmental Information

System Name: FOIAonline - Google Analytics

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This project is in the following stage(s):

| | | |
|----------------------------------|-------------------------|----------------|
| Definition | Development/Acquisition | Implementation |
| Operation & Maintenance X | Termination | |

I. Data in the System

1. Describe what data/information will be collected/contained in the system.

FOIAonline will collect the name and mail address of FOIA requesters. Requesters may also provide fax numbers and email addresses, but this information is not required. Routine correspondence with the requester, along with responsive records from the agency will be maintained in the system.

2. What are the sources and types of the data/information in the system?

FOIA requesters will be providing the information. The agency will supply correspondence and responsive records.

Google Analytics will provide the Agency with aggregate information depicting site usage activity.

3. How will the information be used by the Agency?

To process FOIA requests and FOIA appeals. Google Analytic information will assist the Agency, its partners and contractors in identifying areas of the system to improve based on site usage.

4. Why is the information being collected? (Purpose)

To allow the public to submit and the agency to process FOIA requests and FOIA appeals. Collecting site usage activity is a common practice and the only means to determine how the public is actually using features on any given web site.

II. Access Controls for the Data

1. Who will have access to the data/information in the system (*internal and external parties*)? 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)?

The public, agency personnel, and contractors will have access to the information. The above reference FAR clauses are part of the CGI Federal and Booz Allen Hamilton contracts. These two contractors are the prime contractors that support FOIAonline.

Only the Agency, its partners, and system management contractors will have access to the aggregated information generated by Google Analytics.

2. How have you educated those having authorized access about the misuse of PII data?

Federal system users were provided training prior to deployment of FOIAonline. The only privacy data is the name, address, and contact information of requesters. All users are responsible for protecting the privacy rights of the requesters and appellant. All users are provided appropriate training.

3. Do other systems share or have access to data/information in this system? If yes, explain who will be responsible for protecting the privacy rights of the individuals affected by the interface? (*i.e., System Administrators, System Developers, System Managers*)

No.

4. Will other agencies, state or local governments share or have access to data/information in this system (*includes any entity external to EPA*)? If so, what type of agreement was issued: (*i.e., ISA, MOU, etc.*) If any agreements were issued, the Privacy Program will need a copy for our files.

Yes. Memorandum of Agreements (MOA) with partner agencies have been established. Copies of the MOAs have been provided to the Privacy Program.

5. Is the data and /or processes being consolidated? (*i.e., paper to electronic*) If so, are the proper controls in place to protect the data from unauthorized access or use?

Access to FOIAonline is limited to registered users and is a FISMA moderate, therefore the system has appropriate controls to protect unauthorized access.

III. Attributes of the Data

1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed.

In order to submit a FOIA request you are required by regulation to provide your name and mailing address.

Google Analytics aggregated information will be used to help improve the system.

2. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier more than 50% of the time? If yes, explain. (*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.*)

All FOIA requests and appeals that are maintained within FOIAonline are assigned tracking numbers based on submission time and date. A registered user can access a list of its requests by using a username and password they created.

3. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? If yes, how is notice given to the individual. (*Privacy policies must clearly explain where the collection or sharing of certain information may be optional and provide users a mechanism to assert any preference to withhold information or prohibit secondary use.*)

No. Requesters are required to provide a name and mailing address to make a FOIA request, which is a public request.

4. Where is the Web privacy policy stated?

<https://foiaonline.regulations.gov/foia/action/public/home#>

IV. Maintenance and Administrative Controls

1. Has a record control schedule been issued for the records in the system? If so, provide the schedule number. (*You may check with the record liaison officer (RLO) for your AA-ship or Tammy Boulware (Headquarters Records Officer) to determine if there is a retention schedule for the subject records. All systems must have a record control schedule.*)

Yes. The record control schedule for FOIAonline is GRS 14.

2. While the data are retained in the system, what are the requirements for determining if the data are still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

FOIAonline is used to process FOIA requests and appeals. Records are maintained for a predetermined period of time based upon an approved, by the Archivist of the United States, record schedule. EPA maintains its records for a period of 2 or 6 years based upon GRS-14. Once a decision is made through FOIA the records must be maintained in their current state for the term of the record retention schedule.

3. Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain.

No.

4. Does the system use any persistent tracking technologies?

No. Google Analytics does use persistent tracking cookies to follow site usage activity, but the information on the specific user is masked by truncating their IP address and only aggregate information is stored and provided back to the Agency.

5. Under which System of Records (SOR) notice does the system operate? Provide the name of the system and its SOR number if applicable. All Agency SORs are posted at <http://www.epa.gov/privacy/notice/>. (*A SOR is any collection of records under control of the Agency in which the data is retrieved by a personal identifier. The SOR must contain the same categories of records and cover the same routine uses of your system.*)

EPA/GOV-2