

PRIVACY IMPACT ASSESSMENT

Submit in **Word format** electronically to: Linda Person (person.linda@epa.gov)

Office of Environmental Information

System Name: Labor and Employee Relations Information System (LERIS)

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Date: 07/23/13 Phone: 202/564-4702

This project is in the following stage(s):

- Definition Development/Acquisition Implementation
Operation & Maintenance Termination

(Note: Once the system is in the Operation & Maintenance stage, the PIA should only be updated if there is a **significant** change in the system, such as a change in the data being collected, accesses to the system, data retrieval, etc.)

I. Data in the System

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

SSN, DOB, Address, telephone number, medical information, banking information

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

SF-50s, Reports of Investigation

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

In the processing of disciplinary and adverse actions

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

This is a normal part of the process in processing disciplinary and adverse actions. The data is used to properly identify the employee and to assemble facts pertaining to the action being taken. The information is used as supporting documentation and to draft legal documents, such as proposal and decision letters.

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)?

Federal employees. Specifically, EPA employees in various LER offices who have a need to know the information.

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

Yes. The agency conducts an annual IT Security Awareness training, which is mandatory.

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. LERIS draws some employee information from outside systems (e.g., PeoplePlus), but does not provide information to outside systems.

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.*

No. The information contained in LERIS is for EPA LER use only.

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?

When LERIS is operational, the current paper files in various LER offices will be scanned into LERIS and the paper files destroyed.

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.

The data is necessary to properly identify the employee and to accurately reflect the events pertaining to the action being taken against the employee.

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.*)

Most often by name. In the event that more than one employee has the same name, the PII will be used to accurately identify the proper employee.

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. The information will be obtained through e-OPF and/or a report of investigation.

4. Where is the Web privacy policy stated?

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.*)

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?

OPM Guidelines

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

No. LERIS is a case tracking and management system.

4. Does the system use any persistent tracking technologies?

No.

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 the 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.*)