

PRIVACY IMPACT ASSESSMENT

Submit in *Word format* electronically to: Judy Earle (earle.judy@epa.gov)

Office of Environmental Information

System Name: Superfund Enterprise Management System (SEMS)		
Preparer: William Bushee, Steven Wyman	Office: OSWER/OSRTI/RMD	
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Reason for Submittal: New PIA <input type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input checked="" type="checkbox"/>		
This project is in the following life cycle stage(s): Operations & Maintenance (O&M)		
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>	Implementation <input type="checkbox"/>
Operation & Maintenance <input checked="" type="checkbox"/> Termination/Decommissioned <input type="checkbox"/>		
<p>Note: Existing Systems require an updated PIA when there is a significant modification or where changes have been made to the system that may create a new privacy risk. For a listing of significant modifications, see OMB Circular A-130, Appendix 1, Section (c) (1) (a-f) at http://www.whitehouse.gov/omb/circulars/a130/a130appendix_i.aspx</p>		

I. Data in the System

1. What data elements will be collected/contained in the system?

SEMS will contain data/information that supports program activities and decisions regarding cleaning up specific Superfund sites and is intended to provide repositories of or access point to a variety of program data including site management, cost recovery, site financial information, enforcement actions, and supporting documentation.

2. What are the sources (people/systems) and types (categories) of the data/information in the system?

Information that will be captured in SEMS is derived from a variety of sources, including existing programmatic records, Agency staff and contractors, civil investigators, attorneys, and the like. As the SEMS solution will be integration of existing Superfund systems and their respective information, the information may include correspondence, reports, laboratory analyses, FOIA requests and responses, photographs, technical drawings, maps, and digital audio/video clips that are specific to the Superfund, Brownfields, Emergency Response and Prevention, Cost Recovery,

Enforcement and other delegated/non-delegated EPA programs with ties to the Superfund program.

3. Why is the information collected? (Purpose)

The information will be collected in support of activities and decisions related to the investigation and cleanup of Superfund sites.

4. How is the information collected?

Those with responsibilities for site cleanup and management submit data and records to the system. Those with such responsibilities include site assessors, remedial project managers, on scene coordinators, enforcement officers, attorneys, financial analysts, and others. The data come from a wide variety of sources.

5. Is this a paper and/or electronic collection of data?

Both

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

SEMS information will be used in a variety of ways, including but not limited to: research, enforcement and compliance, litigation support, responses to Congressional and FOIA requests, public participation in the Superfund process, electronic archiving, cost recovery, disaster recovery, and support of the program/Agency mission.

7. If the system has been revised or terminated, are the original personally identifiable information (PII) elements still being collected or contained in the system? Yes___ No__X_. If no, what are the elements currently being collected? When did the collection of the original PII elements stop? How was the old data removed from the system?

SEMS does not collect PII, the information system collects information about sites.

II. Access Controls for the Data

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, users are assigned roles and privileges by the system administrator in the regions who manage and control access to the various applications, modules, and forms in SEMS. The System Administrator role will determine which users have access to the SEMS applications, and within an application, which forms, functions, and reports a user can access. Before a user is granted access, they must complete a new user form and signed by their supervisor. Staff are then assigned particular roles, and through these roles assignments, they acquire rights "permissions" to perform particular functions.

2. Has the data in the system been encrypted according to the National Institute of Standards and Technology (NIST) requirements? (**Note: this requirement is for sensitive PII only**)

No, not at this time

3. Has the system undergone a risk analysis to identify harms that may result from technical failures, malevolent third parties or human error? Yes No (**Note: The risk analysis will help identify possible risks to the data in the system.**)
4. How will you educate individuals/users having authorized access about the misuse of PII data? What type of training will users receive?

All authorized users of the SEMS application are required to take an annual security training identifying the user's role and responsibilities for protecting the Agency's information resources, as well as, consequences for not adhering to the policy.

5. 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)?

EPA Employees and contractors. While there is EPA policy that contracts should include the reference FAR clause, the SEMS owner cannot currently guarantee that every contractor in every capacity is working from a contract that has incorporated this guidance. If that is a requirement then we will need to conduct a full contractor access review.

6. Will other systems, agencies, state or local governments or other external parties (i.e., non-EPA) share or have access to information in this system? Yes No . If yes, what type of agreement was issued (*i.e., ISA, MOU, etc.*)? ***If any agreements were issued, please supply the Privacy Program a copy of the agreement.***

Not at this time

7. Will data and/or processes be converted from paper to electronic? If so, what controls are in place to protect the data from unauthorized access or use?

Physical documents are scanned to the SEMS document repository using document capture software. Electronic documents are submitted manually to the repository, using the ExpressLink application or Data Upload tool. All content delivery methods use the appropriate authentication mechanisms and role based access with user ID and password.

III. Attributes of the Data

1. How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes 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.*)

PII is not deliberately collected for tracking in SEMS, however PII may be contained in some documents stored in the document repository. Such data can be retrieved only by full text search criteria. Personal identifiers can be retrievable in SEMS unless they have been permanently redacted from the electronic file, though no specific search fields for PII exist. The system is designed to capture information about sites, not individuals, therefore users will primarily retrieve information by Site Name or EPA Site Identification Number.

2. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? Yes No 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.)

Individuals' information has not been included in the system. In the future, if personal information is to be collected from individuals, such as when compiling contact lists resulting from public meetings, privacy notices will be provided to the public as appropriate. Such information will be flagged as confidential upon entry in SEMS and will not be released to the public.

3. Where is the privacy policy (paper-form)/notice (electronic-webpage) posted?

There is a web publishing component in development at this time. The Web privacy policy is that which governs the Agency website and will be strictly adhered to by SEMS.

4. Has a record control schedule been issued for the records in the system or the system itself? If so, provide the schedule number.

A record control schedule has not yet been issued for this system. However, in cooperation with NARA, a schedule is under development. It will closely mirror the retention schedules for paper Superfund records. Superfund records are subject, almost universally, to a 30-year retention period. Exceptions include FOIA requests and responses with a 3-year retention period, vital records (such as Records of Decision) and the Hurricane Katrina and Rita records, with permanent retention schedules.

5. While the data are retained in the system, what are the requirements for determining that the information collected remains sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

Records retention notification functionality has not been fully incorporated into SEMS. Oracle's Universal Records Management (URM) will be integrated with SEMS during this Fiscal Year. URM manages content items based upon their retention schedule, which will determine the life cycle of that content item. Business requirements will be defined to determine the timely disposition of the record. Litigation holds will also be addressed to ensure records are preserved even when their disposition has been met.

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

No

7. Does this system use any persistent tracking technologies?

No