

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 Marlyn Aguilar, at aguilar.marlyn@epa.gov or (202) 566-0012.

System Name: Contract Laboratory Program Support System (CLPSS)		
Preparer: Renee Hamilton	Office: OLEM/OSRTI/TIFSD/ASB	
Date: 10/9/17	Phone: (703) 603-9092	
Reason for Submittal: New PIA __ _ Revised PIA __ X __ Annual Review ____ Rescindment ____		
This system is in the following life cycle stage(s):		
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>	Implementation <input 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 CLPSS provides centralized, automated support of processes inherent in the collection, analysis, evaluation, reporting, and payment of samples and analytical chemistry services under the CLP. CLPSS also maintains database and tracking systems to track performance of analytical methods, provide data for Superfund cost recovery, monitor laboratory performance, and maintain laboratory contract and invoicing information. In addition, CLPSS is used to distribute electronic analytical data for use in Regional programs and ASB research studies. The CLPSS is housed and maintained on the SMO Contractor-provided Information Technology (IT) infrastructure, servers, and software in Falls Church, VA. All of the primary and subsystem operating components of CLPSS are owned by the EPA

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?** ASB manages and supports the Contract Laboratory Program (CLP). The CLP is a national network of commercial laboratories and support contractors whose fundamental mission is

to provide data of known and documented quality. The CLP supports EPA's Superfund program, created under the 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and currently under the 1986 Superfund Amendments and Reauthorization Act (SARA). The Contract Laboratory Program Support System (CLPSS) provides centralized, automated support of processes inherent in the collection, analysis, evaluation, reporting, and payment of samples and analytical chemistry services under EPA's Contract Laboratory Program (CLP). The system was first granted the Authority to Operate (ATO) in November 2002; the accreditation was valid for three years and was re-accredited every three years or whenever a major change occurs. CLPSS obtained continuous ATO since November 2002 until now. The last ATO was granted on December 29, 2016. The Office of Environmental Information Policy's EPA classification No: CIO 2134.0 establishes objectives, responsibilities and procedures for preparation, review and clearances for Agency efforts to collect or obtain information from the public in support of the Agency mission.

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

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.

The information in CLPSS is NOT covered by the Paperwork Reduction Act (PRA). It was not required to submit to OMB an Information Collection Request (ICR), therefore, no OMB control number and agency number were issued.

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).

Data collected, used, disseminated or maintained by the system is CLP Laboratory Contract data, sample data, and analytical data. CLPSS maintains database and tracking systems to track performance of analytical methods, provides data for Superfund Cost Recovery, monitors laboratory performance, and maintains laboratory contract and invoicing information.

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

The sensitivity of data exchanged is Confidential Business Data related to the CLP

Laboratory and not classified as sensitive. There is no Personally Identifiable (PII) data being transmitted with the system.

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. The CLPSS application, where possible, provides drop-down lists to limit the possibility of someone entering inaccurate information. Fields that require manual entries perform authentication checks, such as format matching for dollar amounts and exceeding funds available. CLPSS organizational data that is collected in the system is not sensitive and changes to any data in CLPSS is controlled by the user. The SMO Contractor maintain procedures to give data subjects reasonable access to data as appropriate, as well as the ability to correct, delete, or update inaccurate or incomplete information. Also, there is a specific CLPSS function /task (EXES) that performs an automated quality control checks on CLP laboratories electronic deliverables to ensure accuracy of lab analytical data.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: Low (Name is the only Personally Identifiable Information (PII) data used within CLPSS).

Mitigation: N/A

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 CLP laboratories provide data which can be used for a variety of purposes including defining the nature and extent of contamination at Superfund sites. Supporting documentation regarding costs of these services needs to be provided quickly because of cost recovery activities associated with Superfund litigation.

3.2 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.)

Data is retrieved by a unique id/tracking group id number generated by the system as data is submitted by the CLP Laboratory.

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

N/A

3.4 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information? N/A

3.5 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. N/A

3.6 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: Low – Name is the only Personally Identifiable Information (PII) data used with the system. When a person registers for access to CLPSS they create a user ID and password that are used to access CLPSS. Their name is collected at the time they register for access to the system and is stored in CLPSS with their user ID and password. CLPSS collects only the information that is necessary which reduces the risks and the burden to safeguard the information collected.

Mitigation: N/A

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. N/A

4.2 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? N/A

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: **Low** (Name is the only Personally Identifiable Information (PII) data collected within CLPSS).

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Mitigation: N/A

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?

All accounts are separated into roles. The roles have varying functions from general users up to administrative rights to prevent misuse. Users are only provided the rights necessary to perform their jobs. Access to data within the application is controlled by access controls specific to a role, and all users are assigned to specific roles. The most restrictive rights are developed for system access and granted with respect to least privilege at the functional level for maintaining the operation of the system, as well as within the application, for using the system. For example, you must register and accept the terms and agreement before gaining access to tasks or functions. The organizations can manage their profile and any information is updated and reset by the organization user after they are approved and granted access to the system. All SMO users that have access to CLPSS must have an active Position of Trust.

5.2 Are there other components with assigned roles and responsibilities within the system? The most restrictive rights are granted with respect to least privilege at the functional level for maintaining the operation of the system, as well as within the application, for using the system. Accounts are separated into roles and groups and the system prevents non-privileged users from executing privileged functions based on their role and within a defined group.

5.3 Who (*internal and external parties*) will have access to the data/information in the system? EPA personnel and contractors have access to CLPSS data. Contractors include: CLP Laboratories, CSRA-SMO Contractors.

5.4 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)? Yes

5.5 What procedures are in place to determine which users may access the information and how does the system determine who has access? SMO has a Standard Operating Procedure (SOP) SIS-03. Users can request access to the SMO Portal and are assigned particular tasks within the system based on their organization. The SMO Data Administrator (DA) will follow the procedures outlined in the SOP when approving or rejecting Users for access to tasks. Once Users are approved by the EPA System Owner, the SMO DA is also responsible for managing the User accounts and any account modifications. Users who are performing work for the EPA may request access to the SMO Portal. Access within the SMO Portal will be restricted based on the User's organization and associated tasks. A User is approved once its profile and requested tasks have been reviewed. All staff accessing the network will be required to read the Rules of Behavior and acknowledge they accept the terms when registering for an account to CLPSS through the SMO Portal before they are issued a user id and access to the system. All SMO contract support personnel are also required to attend regular Security Awareness Training related to their work function. The Rules of Behavior are based on Federal laws and regulations and EPA directives.

5.6 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. Hard copy of laboratory analytical data and related hardcopy deliverables are stored at the EPA Federal Records Center (FRC). Hard copy data is retained at FRC for 30 years. The reason for retaining this information is for Cost Recovery of Superfund sites. CLPSS is under EPA Records Schedule 0089 (Title: Information Tracking Systems; Status: Final, 05/31/2017; NARA Disposal Authority: DAA-GRS-2013-00020016)

5.7 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist? Yes. NARA Approval date: 08/00/2015

5.8 Privacy Impact Analysis: Related to Retention

Privacy Risk: Low - "Name" is the only Personally Identifiable Information (PII) data being collected in CLPSS, but name is not included in the hard copy data retained at FRC.

Mitigation: N/A

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.** No
- 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.** There is no external sharing of CLPSS data outside the EPA.
- 6.3 Does the agreement place limitations on re-dissemination?** N/A
- 6.4 Describe how the system maintains a record of any disclosures outside of the Agency.** N/A
- 6.5 How does the system review and approve information sharing agreements, MOU, new uses of the information, new access to the system by organizations within EPA and outside?** For organizations within EPA, a Memorandum of Understanding (MOU) and an Interconnection Security Agreement (ISA) exist between CLPSS and Contract Payment System (CPS). Invoice data is exchanged between the two systems and data transmitted is Confidential Business Data related to CLP Laboratory data. The sensitivity of data exchanged between US EPA and the SMO Contractor is Confidential Business Data related to CLP Laboratory and not-classified as sensitive. There is no (PII) data being transmitted or linked which reduces the sensitivity and reduces the risk resulting from disclosure. EPA system users are expected to protect CLPSS database and CSRA system users are expected to protect CPS database in accordance with the Privacy Act & Trade Secret Act and the Unauthorized Access Act.
- 6.6 Privacy Impact Analysis: Related to Information Sharing**
- Privacy Risk: None** (There is no Personally Identifiable Information (PII) data being transmitted within CLPSS). Invoice data is exchanged between CLPSS and the Contract Payment System (CPS). The data transmitted does not include 'name' only Confidential Business Data related to CLP Laboratory data is transmitted.
- Mitigation: N/A**

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?** The CLPSS system collects organization information on laboratories,

EPA Regional offices and Sampling contractors who use the CLPSS system. The system may collect the organization Point of Contact (POC) /Users name but all address and phone number information is specific to the organization/business not personal information. For example USEPA Region 5 Headquarters – all users with access to CLPSSs would have their name but the phone number and address are the EPA address. There is no linkable data to a person’s identity as only their name is collected and no personnel address, birth date, etc. Therefore, name is the only Personally Identifiable (PII) data collected with the system.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information? CLPSS data that is collected in the system is only name which is PII data and changes to any data in CLPSS are controlled by the user. The SMO Contractor maintain procedures to give data subjects reasonable access to data as appropriate, as well as the ability to correct, delete, or update inaccurate or incomplete information.

7.3 How does the system notify individuals about the procedures for correcting their information? Any data changed in the system by the user is validated by the system, for example incorrect organization email address is entered. The system sends automated reports to the user and these would bounce back and would require a SMO coordinator to call the user to verify the correct address was entered in the system. The SMO Contractor retains responsibility and accountability for CLPSS data and ensures processing complies with applicable data protection and privacy laws and regulation as well as SMO Contractor’ data protection and privacy policy.

7.4 Privacy Impact Analysis: Related to Redress

Low (Name is the only Personally Identifiable Information (PII) data being collected within CLPSS). CLPSS collects minimum information that is necessary for the system. The PII data collected which is only “name” and changes to any data in CLPSS are controlled by the user.

Mitigation: N/A

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? EPA has an established Privacy Policy 2151.0 which establishes the National Privacy Program for EPA which provides national oversight for administering and ensuring EPA's compliance with its requirements under the Privacy Act of 1974, the E-Government Act of 2002, the Federal Information Security Management Act (FISMA) and policy guidance issued by the President and Office of Management and Budget

(OMB). This Policy applies to all EPA employees, managers, contractors, and grantees working on behalf of EPA who handle, control, or access documents, records, or information technology (IT) systems that contain Privacy Act and personally identifiable information. In addition, the SMO Contractor has a Global Privacy & Data Protection Director who is responsible to implement privacy policy, to promulgate additional privacy policies as required, and to coordinated privacy related compliance and other services and resources to employees and stakeholders.

8.2 Describe what privacy training is provided to users either generally or specifically relevant to the system/collection. The SMO Contractor has a Chief Information Officer (CIO) and notice is sent annually from the CIO to complete annual Cyber Security & Privacy Awareness training. Completing this training course is required by all SMO Contractor employees to meet regulatory compliance. The course provides valuable information on understanding and protecting yourself from common security threats; identifying Personally Identifiable Information (PII) and understanding the importance of protecting it; and recognizing the signs of insider threat and what to do about it. At the end of the course employee are asked to read and acknowledge The SMO Contractor's User Access Agreement and Standard at the end of the course. The SMO Contractor's Ethics and Compliance Office (ECO) is responsible for ensuring and administering the policy, for auditing compliance and for investigating violations of the policy. The SMO Contractor collects and document privacy awareness training records after acknowledgement of the SMO Contractor's User Access Agreement and Standard. These records can be provided as required to higher authorities and EPA.

8.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk: Low (Name is the only Personally Identifiable Information (PII) data collected within CLPSS and the system audits user login attempts. User audit records include the date, the time and the user name.

Mitigation: N/A