

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: Vendor and Project Management Database System		
Preparer: Denean Jones	Office: Office of Small and Disadvantaged Business Utilization (OSDBU)	
Date: April 4, 2018	Phone: (202) 566-1578	
Reason for Submittal: New PIA <input checked="" type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input type="checkbox"/> Rescindment <input type="checkbox"/>		
This system is in the following life cycle stage(s):		
Definition <input type="checkbox"/>	Development/Acquisition <input checked="" type="checkbox"/>	Implementation <input type="checkbox"/>
Operation & Maintenance <input 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 Vendor Project Management Database System (VPMDS) system is a Commercial Off the Shelf (COTS) database management system designed to enable the Office of Small and Disadvantaged Business Utilization to collect and compile small business vendor management information from our outreach events, track the staff's daily workflow and improve our overall project management. The system is hosted at the National Computer Center at RTP, NC.

VPMDS is a web-based distributed application used for project, vendor, hotline, survey and event management. The system is made up of two core modules:

Internet Module

This module is hosted alongside other Agency's public facing applications. Vendors visiting the Agency's website can submit their vendor profile, conduct vendor searches, sign-up for events and take an online survey.

Intranet Module

This module is hosted alongside other Agency's internal applications. Employees of the office of Small and Disadvantaged Business Utilization (OSDBU) use this application to perform project, vendor, hotline, survey and event management. OSDBU users are required to have a user account and be assigned to a role that specifies what actions they can perform on the system.

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?

Amendments to the Small Business Investment Act of 1958 (Public Law 95-507)

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

The Information Security Plan (ISP) is currently in progress in preparation for review by the Office of the Administrator's Information Security Officer.

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 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 system collects employees names, emails, task descriptions, vendor names, addresses, phone numbers, and websites.

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

The sources of information are the vendors registering for OSBDU outreach events and the employees entering and managing the data.

“One aspect of the system collects data over the Internet (Vendor Management Module) using the federal government point of entry for merchants wishing to do business with the federal government entitled the System for Award Management. Prospective vendors would include the company names of sole proprietors. The other portion of the system is Internal for OSDBU Employees to track daily workflow (Project Management Module). Vendors will be able to gain entry through our website, under our calendar of events. There is a basic information form they must fill out.”



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

Yes, the Vendor Project Management module pulls vendor profiles from the System for Award Management System (SAM). Primary data information source for the Vendor Performance Management Database System will be from the System for Award Management database system hosted by the General Services Administration. The data found in SAM and extracted package data contains the entity registration data publicly available under the Freedom of Information Act (FOIA). The extracted data is used for purposes of promoting small business events. No special data access is needed to download data files; each record is analyzed for its socio-economic and small business status to determine how to promote federal business opportunities to each group. Internal data collection is derived from each OSDBU staff employee's workload as defined by management. The workload project tracking will enable office management to quickly analyze work progression and staff augmentation on projects where warranted.

2.4 Discuss how accuracy of the data is ensured.

All data is extracted from an existing "input" data system, e.g. SAM. The accuracy of the data is dependent on the user entering the information.



2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: None

Mitigation: None

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 uses the information: (1) Tracking OSDBU personnel daily work flow; (2) track vendor participation in OSDBU sponsored outreach events and vendor content that is pulled from SAM

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.)



The system does not retrieve by personal identifier.

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

The system does not retrieve by personal identifier. **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.

- External users can query the database to search for vendors, only, for possible partnerships.
-  Internal users can query the database to search for vendors, projects, tasks and events. 

Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: None

Mitigation: None



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.

There will be an EPA OSDBU Disclaimer Notice on the website indicating data collection will be used for outreach purposes only.

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?

EPA OSDBU Disclaimer Notice on the site to indicate that option to "opt out" or maybe to delete or cancel their registration so that there will not be any records retained.

4.3 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?**

Access levels are granted by the System Administrator based on roles and responsibilities.

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

No

- 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)?**

NCC contractors responsible for managing VPMDS with system administrator rights will have access to the names and email addresses. The privacy clauses will be added to the contract.

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

The roles and responsibilities are provided by the system administrator.

1. To have access to the system, the following conditions must be met: A user must create an account with the system by registering with the system
2. The account must be verified and approved by the OSDDBU system administrator
3. The account must be enabled for use by the administrator
4. The account must be assigned to one of three possible roles (Authorization): Users, Super User and Administrator

After the above conditions are met, to access the system, the user simply need to login with their approved credentials. The user can only access part of the system that is accessible to the role they have been assigned to.

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.

The record schedule is 0089.

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

Yes

5.7 Privacy Impact Analysis: Related to Retention

Privacy Risk: None

Mitigation: None

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 PII is shared, only event details are posted

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.

N/A

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, MOUs, new uses of the information, new access to the system by organizations within EPA and outside?


N/A

6.6 Privacy Impact Analysis: Related to Information Sharing


N/A

Privacy Risk: NONE

Mitigation: NONE



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? Vendors register for individual events and must provide correct information. Each one of them have to register entering their information for each individual event.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Vendors register for individual events and must provide correct information. Each one of them have to register entering their information for each individual event.



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



Vendors register for individual events and must provide correct information. Each one of them have to register entering their information for each individual event.

Yes.

7.4 Privacy Impact Analysis: Related to Redress

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Privacy Risk: None

Mitigation: None

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?



. Only OSDBU staff have access to the information and it is only used for the purposes stated above.

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



The privacy training provided is the Annual IT Security and Privacy Training.

8.3 Privacy Impact Analysis: Related to Auditing and Accountability



Privacy Risk: None

Mitigation: None

