

# PRIVACY IMPACT ASSESSMENT

(Rev. 08/2018)

(All Previous Editions Obsolete)

Please submit your responses to your Liaison Privacy Official

[http://intranet.epa.gov/privacy/pdf/lpo\\_roster.pdf](http://intranet.epa.gov/privacy/pdf/lpo_roster.pdf).

If you need further assistance contact Patricia Brooks, at [brooks.patricia@epa.gov](mailto:brooks.patricia@epa.gov) or (202) 564-3717.

<b>System Name: Facility Registry Service (FRS)</b>	
<b>Preparer: Matthew Kelly</b>	<b>Office: EPA OMS/OIM</b>
<b>Date: 02/18/2019</b>	<b>Phone: 202-566-1597</b>
<b>Reason for Submittal: New PIA</b> <input checked="" type="checkbox"/> <b>Revised PIA</b> <input type="checkbox"/> <b>Annual Review</b> <input type="checkbox"/> <b>Rescindment</b> <input type="checkbox"/>	
<b>This system is in the following life cycle stage(s):</b>	
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>
Operation & Maintenance <input checked="" type="checkbox"/>	Rescindment/Decommissioned <input type="checkbox"/>
<p><b>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>.</b></p> <p><b>The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <u><a href="#">OMB Circular No. A-123, Section VII (A) (pgs. 44-45)</a></u>.</b></p>	

## Provide a general description/overview and purpose of the system:

The Facility Registry Service (FRS) is an EPA major information system (MIS) that identifies facilities, sites, or places subject to environmental regulation or of environmental interest. Using vigorous verification and data management procedures, FRS integrates facility data from EPA’s national systems, state systems, tribal systems, and other federal agencies and provides EPA with a centrally managed, single source of comprehensive and authoritative information on facilities. The EPA national data systems, state systems, tribal partner systems, and other agencies that provide data to FRS for integration will collectively be referred to as *FRS source systems*.

Another aspect of FRS is the Error Tracking System (ETS). ETS is stored within the FRS database instance, but there is no data relationship or connection between ETS and the rest of FRS. ETS is

used to track workflow of errors submitted by the public through ECHO or Envirofacts. The errors are collected by ECHO/Envirofacts and sent to ETS for processing.

This process involves managing correspondence between the person who submitted the error (submitter) and the data steward responsible for correcting the identified error.

Because FRS and ETS have no database linkages, they will be discussed separately in most sections.

## **Section 1.0 Authorities and Other Requirements**

### **1.1 What specific legal authorities and/or Executive Order(s) permit and define the collection of information by the system in question?**

FRS does not collect data, so there is no permitting and defining statutory authority or Executive Order for the data FRS contains from other EPA systems. We looked at the website and the primary EPA program systems that represent the vast majority of FRS data (RCRA, EIS) are not on the website.

### **1.2 Has a system security plan been completed for the information system(s) supporting the system? Does the system have or will the system be issued an Authorization-to-Operate? When does the ATO expire?**

FRS has previously completed a system security plan, including an ATO. The ATO expires on March 4, 2019.

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### **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.**

There is no information collected that is covered by the Paperwork Reduction Act.

### **1.4 Will the data be maintained or stored in a Cloud? If so, is the Cloud Service Provider (CSP) FedRamp approved? What type of service (PaaS, IaaS, SaaS, etc.) will the CSP provide? No**

## **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).**

## FRS

FRS integrates information from FRS source systems. PII information that is integrated and stored with FRS relates to contact information for individuals who have been identified *by* a regulated facility as a contact *for* a regulated facility. This information is provided by the FRS source systems, but is not required to be provided to FRS, therefore FRS does not maintain a complete set of contact information for the facilities stored within the system. The data elements stored by FRS, when provided by FRS source systems, are:

- Full Name
- Title
- Division Name
- Phone Number
- Phone Number Extension
- Alternate Phone
- Fax Number
- Email Address
- Mailing Address
- Supplemental Address
- City Name
- State Name
- Postal Code (zip code)
- Country Name

## ETS

Members of the public who wish to submit an error through ECHO/Envirofacts fill out a form within ECHO/Envirofacts. The information in this form is routed to ETS. Submitters are not required to submit an error using the form; an email address is provided as an alternative. For submitters who do fill out the form, only four fields are required. Those are indicated by an (\*) in the data element list below. Data elements stored in ETS, when provided by ECHO/Envirofacts are:

- First Name\*
- Last Name\*
- Email\*
- Phone Number
- Phone Number Extension
- Preferred Contact Method\*
- Affiliation Type
- Organization

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

Information is provided to FRS by FRS source systems via direct database links,

downloading files or through web services.

Information is provided by ETS from ECHO/Envirofacts, which collects it from members of the public who wish to report an error on a public EPA website.

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

FRS uses a dataset called HERE to assist in core FRS processing, such as standardizing and validating address data. FRS also uses USPS data to assist in the same core FRS processing.

**2.4 Discuss how accuracy of the data is ensured.**

FRS

The FRS source systems that collect the data ensure accuracy through their own processes and programmatic standard operating procedures.

ETS

The error submitters are providing their own contact information, so as the primary source of the information, they are responsible for the accuracy.

**2.5 Privacy Impact Analysis: Related to Characterization of the Information**

*Discuss the privacy risks identified for the specific data elements and for each risk explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.*

**Privacy Risk:**

FRS

There are no privacy risks for FRS, as the contact information collected is intended to be public.

ETS

Due to the potential of having PII for an individual, there is a risk that a person can be identified through the information stored in FRS. This contact information, however, is provided voluntarily by members of the public who wish to be contacted regarding the status of their submitted error. The information collected by ETS from ECHO/Envirofacts does not contain any sensitive PII.

**Mitigation:**

Only the system administrator has access to contact information collected by ETS from ECHO/Envirofacts.

## **Section 3.0 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.*

### **3.1 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?**

#### FRS

FRS information that is not public information is accessible only to EPA staff with the appropriate WAM credentials and system registration approval. This is maintained by a user profile with a system owner/administrator approving individuals for appropriate roles.

#### ETS

ETS information is not public information and only individuals who have the correct roles and authority within ETS can access ETS via their WAM accounts. System owner/administrators approve individuals for appropriate roles.

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

#### FRS

Public users that would like to gain access to non-public aspects of FRS must request access to the community via EPA's Web Application Access (WAA) registration process. The process includes a step in which the owner/administrator member must verify the legitimacy of the request and grant access for the requestor. If the user is granted access to the community, they must then register again in FRS before the user can manage the relationship of FRS source facility records to each other. EPA users must also go through the last step of the process to register in FRS.

#### ETS

ETS information is not public information and only individuals who have the correct roles and authority within ETS can access ETS via their WAM accounts. System owner/administrators approve individuals for appropriate roles.

### **3.3 Are there other components with assigned roles and responsibilities within the system?**

No

**3.4 Who (internal and external parties) will have access to the data/information in the system? If contractors, are the appropriate Federal Acquisition Regulation (FAR) clauses included in the contract?**

Information in both FRS and ETS is available to internal and external parties with the appropriate user ID, permissions, and roles in each system. This includes contractors. The following FAR clauses are included in the contract: 24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act.

**3.5 Explain how long and for what reasons the information is retained. Does the system have an EPA Records Control Schedule? If so, provide the schedule number.**

FRS retains information on a facility so that a user may better understand what information about the facility has changed or if regulatory actions have occurred at the facility over time. Data are retained for as long as needed to conduct Agency business. FRS' EPA Records Control Schedule number is 0096.

**3.6 Privacy Impact Analysis: Related to Retention**

*Discuss the risks associated with the length of time data is retained. How were those risks mitigated? The schedule should align the stated purpose and mission of the system.*

**Privacy Risk:**

None

**Mitigation:**

N/A

**Section 4.0 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.*

**4.1 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.**

## FRS

Some information in FRS is shared outside of EPA via public search pages. Information available on the public search pages is considered public information and is non-confidential.

## ETS

Information in ETS is not shared outside of EPA as part of normal operations.

### **4.2 Describe how the external sharing is compatible with the original purposes of the collection.**

FRS source systems that collect data for regulatory purposes, including the intent to publish, stand to benefit from the cross-program associations made by FRS. FRS provides users the ability to understand more comprehensively the environmental interests at a given facility.

### **4.3 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?**

The FRS system owner reviews and approves, on a case-by-case basis, information sharing agreements and understandings. FRS does not control how data are used outside of EPA-managed applications.

### **4.4 Does the agreement place limitations on re-dissemination?**

No

### **4.5 Privacy Impact Analysis: Related to Information Sharing**

*Discuss the privacy risks associated with the sharing of information outside of the agency.  
How were those risks mitigated?*

#### **Privacy Risk:**

None

#### **Mitigation:**

N/A

## **Section 5.0 Auditing and Accountability**

*The following questions are intended to describe technical and policy based safeguards and security measures.*

**5.1 How does the system ensure that the information is used in accordance with stated practices in this PIA?**

The processes and controls described above outline how FRS ensures information is used in accordance with stated practices in this PIA.

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

Training is given to FRS managers on how to properly vet new user registrations and how to use EPA's WAM user management functions.

**5.3 Privacy Impact Analysis: Related to Auditing and Accountability**

**Privacy Risk:**

None

**Mitigation:**

N/A

**Section 6.0 Uses of the Information**

*The following questions require a clear description of the system's use of information.*

**6.1 Describe how and why the system uses the information.**

FRS identifies facilities, sites, or places subject to environmental regulation or of environmental interest. FRS integrates facility data from EPA's national systems, state systems, tribal systems, and other federal agencies to provide EPA with a centrally managed, single source of comprehensive and authoritative information on facilities.

ETS is used to track workflow of errors submitted by the public through ECHO or Envirofacts. The errors are collected by ECHO/Envirofacts and sent to ETS for processing. This process involves managing correspondence between the person who submitted the error (submitter) and the data steward responsible for correcting the identified error.



**6.2 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.)*

Information is retrieved by FRS ID primarily, but users are able to search on already-collected information in FRS by “contact name”, as well as “facility name” and “address”

**6.3 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?**

None

**6.4 Privacy Impact Analysis: Related to the Uses of Information**

*Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above.*

**Privacy Risk:**

None

**Mitigation:**

N/A

**\*If no SORN is required, STOP HERE.**

*The NPP will determine if a SORN is required. If so, additional sections will be required.*

## **Section 7.0 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.*

**7.1 How does the system provide individuals notice prior to the collection of information? If notice is not provided, explain why not.**

**7.2 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?**

**7.3 Privacy Impact Analysis: Related to Notice**

*Discuss how the notice provided corresponds to the purpose of the project and the stated uses. Discuss how the notice given for the initial collection is consistent with the stated use(s) of the information. Describe how the project has mitigated the risks associated with potentially insufficient notice and opportunity to decline or consent.*

**Privacy Risk:**

**Mitigation:**

**Section 8.0 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.*

**8.1 What are the procedures that allow individuals to access their information?**

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

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

**8.4 Privacy Impact Analysis: Related to Redress**

*Discuss what, if any, redress program the project provides beyond the access and correction afforded under the Privacy Act and FOIA.*

**Privacy Risk:**

**Mitigation:**