

PRIVACY IMPACT ASSESSMENT

(Rev. 2/2020)

(All Previous Editions Obsolete)

Please submit your responses to your Liaison Privacy Official. **All entries must be Times New Roman, 12pt, and start on the next line.** If you need further assistance, contact your LPO. A listing of the LPOs can be found here:

https://usepa.sharepoint.com/:w:/r/sites/oei_Community/OISP/Privacy/LPODoc/LPO%20Roster.docx

System Name: Facility Registry Service (FRS)	
Preparer: Matthew Kelly	Office: EPA OMS/OIM
Date: 7/20/2021	Phone: 202-566-1597
Reason for Submittal: New PIA ____ Revised PIA ____ Annual Review __X__ 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: 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 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. For instance, FRS contains data from the Toxics Release Inventory (TRI), data collected under 40 CFR Part 372. As another example, FRS contains data from the Resource Conservation and Recovery Act (RCRA), authorized under 40 parts 239 through 282.

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 August 1, 2022.

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.

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

The FRS source system list can be found at the following hyperlink:
<https://www.epa.gov/frs/frs-data-sources>

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.

Yes, 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

Potential risk in containing inaccurate contact data due to error transmission.

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:

For FRS, enact regular data quality reviews to ensure accuracy of contact data.

For ETS, ensuring 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 individual for appropriate roles. Beneath the system owner/administrator role, there are two tiers of users that have many limits to what they can view and functions they have access to.

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 In what policy/procedure are the access controls identified in 3.1, documented?

FRS follows EPA Access Control Procedures CIO 2150-P.01.2

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. Records in FRS must be retrievable and usable for as long as needed to conduct Agency business and to meet NARA-approved disposition to comply with 36 CFR Sections 1236.10, 1236.12, 1236.14, and 1236.20.

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:

Records that have not been updated recently may contain information that could be inaccurate.

Mitigation:

Review FRS' records schedule and ensure implementation is followed properly.

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:

Sharing information with individuals who should not have access to sensitive data.

Mitigation:

Ensure controls are in place to review data deliverables prior to transmission to external parties with privacy considerations in mind.

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 as stated in

Section 6.1?

FRS conducts audits of data processing outcomes to ensure that information that is pulled into the database is appropriate. FRS also conducts reviews of system functionality to ensure data is used appropriately.

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

The annual ISPAT training provides training on privacy. Also, 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:

Regular audit of data integration outcomes not performed as expected.

Mitigation:

Conduct regular review of sprint documentation to ensure tasks are performed as expected.

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 “facility name” and “address”.

6.3 What type of evaluation has been conducted on the probable or potential effect of the privacy of individuals whose information is maintained in the system of records?

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:

Applications displaying information that may not be compliant with current privacy requirements.

Mitigation:

Conduct regular audits of applications that use FRS data to ensure presented data is in compliance with current privacy requirements.

***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 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: