

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

<b>System Name: MOSS (OM)</b>	<b>System Owner: Jini Ryan</b>
<b>Preparer: Anthony Singleton</b>	<b>Office: Office of Multimedia</b>
<b>Date: 3/9/2021</b>	<b>Phone: 202-564-2293</b>
<b>Reason for Submittal: New PIA</b> ____ <b>Revised PIA</b> ____ <b>Annual Review</b> <u><b>X</b></u> <b>Rescindment</b> ____	
<b>This system is in the following life cycle stage(s):</b>	
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><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>OMB Circular No. A-123, Section VII (A) (pgs. 44-45).</u></b></p>	

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

EPA Office of Multimedia (OM) is the full-service multimedia production unit. Through broadcasting, webcasting, photography, and graphics, we help keep EPA staff and the general public informed and up to date on the latest Agency activities and messages.

All multimedia produced in EPA's video studios (Studio One) are captured or created, edited, encoded, and broadcast for public distribution. OM keeps a database of all captured or created media for a period of one year, after which the content is sent to the National Archives for permanent storage per records keeping regulations.

Cybersecurity implementation is designed understanding that EPA has established defense in depth. OM will implement the use of ESET endpoint protection advanced. Separate from EPA OEI Symantec Solutions due to the nature of the office. This software package will provide OM ISSO the ability to utilize endpoint protection via Host Intrusion Prevention System (HIPS), Antivirus, Virtual Firewall, and Data Access Control (DAC).

## **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?**

In accordance with OMB Circular No. A-123, Section VII(A) and 44 U.S.C. § 3501 note. Section 208(b); OM system is designed not to collect any PII of any type. All multimedia content generated by OM is in the public-domain and falls under “fair use.”

### **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?**

MOSS does have a SSP published in Xacta and also has a current ATO due to expire in November 20, 2021

### **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.**

Not 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).**

The system collects raw analog or digital video / audio from various camera / microphone input devices for record with digital based recording devices. Digital photography is also taken for record. This data is then manipulated for story telling or information distribution purposes. The final dissemination of the product will be used to transmit the intent of the EPA to the public and EPA employees on behalf of the office of the Administrator. The format of the product could take the form of any or all of the following: video / audio broadcasting via webcasting, closed circuit television, live broadcast television, press announcements, public educational films, or internal EPA training media. All multimedia content generated by OM is in the public-domain and falls under “fair use.”

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

The source of the information is dependent upon the formal request of the internal EPA office or external element that has requested the services of OM. The content is dependent on the type of multimedia service that is needed, for example: B-roll video footage, radio or video interviews, live footage, educational films, training videos, webcasting, web meeting, photographs, graphics, podcasting, etc.

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

In the course of content creation, OM sometimes relies on commercially available materials like stock footage, stock music, stock imagery, etc. that is obtained through a procurement agreement with each source. Non-public information obtained from specific individuals or entities (stakeholders) is used only with express permission from the copyright owner through an EPA consent form. This material is stored only for use in the multimedia content under production and does not transfer to the National Archives as they are not official EPA records and the copyright remains with the source of the material.

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

The data is to be retained on an off-network intranet that resides only within OM. Reliance of data accuracy is high as only assigned/authorized personnel will have access to this data.

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

**Privacy Risk:** All OM-generated content is in the public-domain and falls under “fair use.” The system collects raw digital video / audio from various camera / microphone input devices using digital-based recording devices. Digital photography is also taken for record. This data is then produced into multimedia content, to include public service announcements, feature stories, infographics, photo slideshows, audio podcasts, etc., to disseminate agency messages to EPA employees, stakeholders, and the public. The format of the product can also take one or more of the following forms: video / audio broadcasting via webcasting, closed circuit television, live broadcast television, press announcements, public educational films, or internal EPA training media. As such OM does not remediate the data in any way. At the time of recording one-on-one content with individuals, OM obtains signed consent from the subject using documentation reviewed and approved by the Office of General Counsel to use their likeness. Any media procured from an individual or entity for use in an EPA multimedia product, example photos, video clips, etc., is also obtained using a signed authorization form, also approved by the Office of General Counsel, granting the agency permission to use the material in specific products.

**Mitigation:** N/A

## **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?**

Office of Multimedia intranet equipment will not have access control levels installed beyond two factor authentications due to the operational requirement of multimedia transfers and editing software needing full administrator access for proper use, as well as multimedia production requirements in support of the agency. All personnel will have the ability to have access to the data stores with the Chief Engineer as the systems administrator.

EPA EI-owned equipment will follow normal prescribed controls based upon OEI policies and practices.

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

The policy is uploaded and available in Xacta:

012 MOSS (OM) SIGNED POLICY - Authentication Management 2019-012-ITCS (IA5)

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

None

### **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?**

Only OM government-employed personnel will have explicit access to data. OM does not employ contractors.

**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.**

Record schedule class 722 has been established. OM maintains digital signatures, audit, network traffic logs, system logs, and non-final product, video footage, audio/photo/graphics files for one year. Completed products and raw OM-captured content is shipped to the National Archives for historical preservation, which is researchable by obtaining a FOIA request or contacting NARA directly.

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

Privacy Risk: OM maintenance of digital signatures, audit, network traffic logs, system logs, and non-final product, video footage, audio/photo/graphics files for a storage period of one year is secured physically behind a keyed main door and a crypto key access door. The data store is further secured by maintaining an off-network enclave for the primary database and relying upon EPA's established network designed defense in-depth schema for protection. OM content is stored for a period of one year then transferred to the National Archives for historical preservation.

**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.**

Yes, information is created to be shared outside of EPA as part of normal agency operations through the Office of Public Affairs. All OM-captured and generated content is considered "fair use" and readily available to the public upon request. The data is public information and available to other agencies, state, and local governments, and the general public through the EPA website, news sites, social media channels and web-based hosts, or through a FOIA (Freedom of Information Act) request. Other agencies, state, or local governments do not have direct access to the system.

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

Multimedia data is shared to external sources with an approved FOIA (Freedom of Information Act) request. The data shared is considered “fair use” and available for external EPA use.

**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?**

OM system does not conduct any information sharing beyond a formal FOIA request. No PII is stored thus cannot be shared at any time.

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

All OM-captured and generated content is considered “fair use” and readily available to the public upon request.

**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:** All OM-captured and generated content is considered “fair use” and readily available to the public upon request. All OM-generated content is transferred to the National Archives for historic preservation and is readily available upon request by any individual or entity. Privacy risk is at the lowest level and does not need to be remediated.

**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 as stated in Section 6.1?**

The system collects raw analog or digital video, audio and photo assets from a variety of sources. This data is then manipulated for storytelling or agency messaging purposes. All multimedia content generated by OM is in the public-domain and falls under “fair use.” Content is stored on secure GFE systems and used in conjunction with specific projects

and agency messaging needs. Consent forms are collected by project team leads in EPA programs and regions granting the agency authorization to use the multimedia material to generate agency communications content. The final disposition of the video, graphic and photo assets follows agency records management protocols.

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

OM will enforce EPA general information network security training.

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

**Privacy Risk:** N/A

**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.**

The data acquired is used to inform EPA employees, stakeholders and the public about the agency's mission and priorities via audiovisual methodologies to produce educational, training, public information, interviews, and specialty features.

**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 date of event or project, and program or subject content.

**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?**

*[The goal here is to look at the data collected, how you plan to use it, and to ensure that you have limited the access to the people who have a need to know in the performance of their official duties. What controls have you erected around the data, so that privacy is not invaded? ex. administrative control, physical control, technical control.]*

Prior to collection of multimedia assets, project team leads in EPA programs and regions are required to obtain signed agency consent forms from individuals, to include EPA employees, who will be participating in the multimedia project via interviews, footage, photos, graphics and audio actualities. Assigned OM producers maintain and access the data to create the multimedia content to disseminate agency messages. The media assets collected are considered “fair use” and those interviewed by OM have no reasonable expectation of privacy by signing the consent form. OM limits access to its data to only authorized users of the OM system, however, OM responds to data requests through the FOIA process and enquiries to the Office of Public Affairs and releases only relevant materials in relation to those requests.

#### **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:** N/A

**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.**

Any individual who wants to know whether this system of records contains a record about him or her, should make a written request to the Attn: Agency Privacy Officer, MC 2831T, 1200 Pennsylvania Ave., NW., Washington, D.C. 20460, [privacy@epa.gov](mailto:privacy@epa.gov).



**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?**

Individuals seeking access to information in this system of records about themselves are required to provide adequate identification (e.g., driver's license, military identification card, employee badge or identification card). Additional identity verification procedures may be required, as warranted. Requests must meet the requirements of EPA regulations that implement the Privacy Act of 1974, at 40 CFR part 16.

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

Requests for correction or amendment must identify the record to be changed and the corrective action sought. Complete EPA Privacy Act procedures are described in EPA's Privacy Act regulations at 40 CFR part 16.

**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:**