

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: Telework Application	
Preparer: Joe Carioti	Office: OMS/OIM
Date: 12/13/23	Phone: 202-564-6413
Reason for Submittal: New PIA_____ Revised PIA__x__ Annual Review_____ Rescindment _____	
This system is in the following life cycle stage(s): Re-development	
Definition <input type="checkbox"/> Development/Acquisition <input checked="" type="checkbox"/> Implementation <input type="checkbox"/>	
Operation & Maintenance <input type="checkbox"/> Rescindment/Decommissioned <input type="checkbox"/>	
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>	
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>	

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

EPA's Telework Agreement is being modernized from an online PDF form to an automated collection and submission process using Microsoft Power Platform components to collect, process and disseminate information within EPA. The data collected and contained in the system will be derived from information provided by employees who participate in any aspect of the agency's Telework Program. The program is voluntary, however, the majority of agency employees participate in some way (regular, situational, medical or reasonable accommodations). The data collection process may be triggered by an initial request, annual recertification, or revision/changes to current forms. The primary form is the EPA Telework Program Agreement, and it also has a related form, Safety Checklist. The Agency forms are available to employees based on their bargaining unit status. The information collected is similar to the

prior online PDF form process with some minor changes to remove unnecessary data collection, streamline the collection process, and reduce the number of forms and data elements.

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?

- Telework Policy, EPA Order 3110.32
- The Telework Enhancement Act of 2010 (Federal policy)
- (and to a lesser extent: Remote Work Policy, EPA Order 3110.32A, Work Schedules, EPA Order 3162)

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?

The Telework Application is part of a series of human resource data collections and is utilizing a system (Microsoft Power Platform) at EPA operating with an ATO under the Email and Collaboration Solutions (ECS) ATO which expires on November 10, 2025.

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 applicable. We are collecting information only from agency employees (internal to EPA).

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?

The data will be stored in Microsoft's Government Community Cloud. The Power Apps GCC environment provides compliance with FedRAMP High, DoD DISA IL2, and requirements for criminal justice systems.

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 following information contains information collected from each employee for the initial instance of utilizing the form. This process has been significantly automated, reducing the burden for the employee to complete each data element. Only the data elements marked with “employee provided” require employee input, everything else is automated and pulled from existing EPA systems in a secure manner:

Data Element Containing PII/SPII	Action	Source
Employee’s Name	Collects	Microsoft Entra ID ¹
Supervisor’s Name	Collects	Microsoft Entra ID
Primary Address of Alternative Work Location(s) (including city, state, and zip code):	Collects	OASIS, Employee provided
Secondary Address of Alternative Work Location(s) (including city, state, and zip code):	Collects	Employee provided

Non-PII Data Elements	Action	Source
Job Title, Pay Plan, Series & Grade:	Collects	OASIS
Office/Region and Division:	Collects	Microsoft Entra ID
Address of Regular Office or Worksite:	Collects	Microsoft Entra ID
Employee’s Work Phone:	Collects	Microsoft Entra ID
Employee’s Work Email Address	Collects	Microsoft Entra ID
Supervisor’s Work Phone & Email Address:	Collects	Microsoft Entra ID
Proposed Start Date:	Collects	Employee provided

¹ Microsoft Entra ID was formerly known as Azure AD. While there is a name change, for the purpose of describing EPA’s automated telework application, the function does not change.

Proposed End Date (for medical telework):	Collects	Employee provided
Check one: <input type="checkbox"/> New Request <input type="checkbox"/> Request for Modification to Existing Agreement	Collects	Employee provided
Type of Telework Agreement: <input type="checkbox"/> Regular Telework <input type="checkbox"/> Situational Telework <input type="checkbox"/> Medical (attach supporting documentation) <input type="checkbox"/> Reasonable Accommodation	Collects	Employee provided
Schedule – Select the location where work will be performed: Regular Office/Worksite or AWL Monday Tuesday Wednesday Thursday Friday Pay Period Week #1 Pay Period Week #2	Collects	Employee provided
Employee Certification:	Collects	Employee provided
Approval/Disapproval: (Proposed modification – through workflow) <input type="checkbox"/> Approved with Modifications (cite reason(s) and modification below)	Collects	Supervisor provided
Disapproved (cite reason(s) below)	Collects	Supervisor provided
Employee’s Signature: (Proposed modification – delete and use certification above)	Will be removed and action will be accomplished through workflow process	Employee
Supervisor’s Signature: (Proposed modification – delete and use workflow)		Supervisor

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

Sources include:

- 1) Data entered by employee on an annual, or as needed basis. As needed basis may be triggered by a change in employee’s schedule or working conditions, onboarding new employee, and/or recertification.
- 2) Microsoft Entra ID will pre-populate data (including PII) including: employee name, email, phone, address of regular office/worksites, job title, office/region and division,

supervisor, supervisor's email, and supervisor's phone.

3) OASIS will provide pay plan, grade, series, address, and bargaining unit status.

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, this is internal to EPA only – the Telework application does not use information from commercial sources or any publicly available information. We will be using EPA's Microsoft Entra ID and OASIS database for the user data.

2.4 Discuss how accuracy of the data is ensured.

Data entered by employees and imported from Microsoft Entra ID is reviewed at multiple levels and by several individuals, including:

- 1) Employee certifies information is correct.
- 2) Supervisor reviews application for accuracy and whether it supports the agency's work. Supervisor can approve or deny the request.

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: The main privacy risk in the Telework form would be employee telework data being viewable by other employees.

Mitigation: We mitigate risk of data spillage by controlling user read/write access to the application using implemented controls within DataVerse that are maintained by Microsoft and covered under the platform-level ATO. Only users with approved roles will be able to view another employee's telework data, for example, a supervisor or agency representative as deemed appropriate by OHR guidance.

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?

Yes, Microsoft has access roles assigned to users through an administrative group. Access to this Telework Application will occur through Microsoft Entra ID which requires agency users to sign on using Agency approved credentials (e.g., PIV card, computer password).

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

Microsoft maintains the documentation for column level security, here:
<https://learn.microsoft.com/en-us/power-platform/admin/field-level-security>

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

No, there are no users outside of the agency. The Telework application will not contain additional components with assigned roles and responsibilities within the system.

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?

Federal employees who work in the Office of Human Resources and implement the telework program, agency supervisors, and agency representatives will have access to the information in the telework application. This data will be utilized to respond to annual OMB and OPM data calls about the implementation of telework schedules at the agency level. Data may be reviewed and reported at the agency or organizational levels. Contractors do not have access to this system.

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.

Data currently collected by the OHR for telework is covered by EPA Records Schedule 039 and includes records related to requests or applications to participate in an alternate worksite program, known at EPA as "Flexiplace." Also includes agreements between EPA and the employee; records relating to the safety of the worksite, the installation and use of equipment, hardware, and software, and the use of secure, classified information or data subject to the Privacy Act.

Paper records from current PDF forms are required to be maintained for one year.

Schedule No.	Schedule Title	Function Code	Program	Applicability	Revised on
039	Alternate Worksite Records	403	Personnel	Agency-wide	12/31/2013

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: The data for this application is contained within Dataverse for a longer length of time than necessary.

Mitigation: Dataverse is a Platform-Level capability/controls maintained by Microsoft and already covered under the platform-level ATO.

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.

No agreements are in place to share this information/data.

Data is provided by EPA to OMB/OPM upon request for annual (or more frequent) reporting. Information is pulled from the telework forms and shared with OMB/OPM typically via a spreadsheet. No PII is shared externally.

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

The information is collected for internal oversight and management of employees. No PII is shared externally. Typically OMB/OPM data calls request information at the agency level (e.g., number of employees who telework) and no data is shared at the individual record level.

Agency telework coordinators and OHR staff prepare the data that is shared with OPM/OMB. Data is reviewed at the highest levels including OHR Director, Chief Human Capital Officer, and Assistant Administrator.

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?

Information sharing is performed outside of the system – typically by providing an excel spreadsheet. There are no MOUs in place.

The system will be accessible to all agency employees, new access will be granted to new employees. The telework application is not accessible to anyone outside the Agency. Contractors that support the agency and whose role necessitates access to the system will be granted access on a need basis.

4.4 Does the agreement place limitations on re-dissemination?

N/A

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: N/A

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 uses access level controls to ensure that only the appropriate roles are exposed to the appropriate level of decision-making administrative data and the application owners will ensure that these roles are properly trained on the use of this system and its associated data.

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

There is a privacy statement associated with this data. Additionally, mandatory EPA Information Security and Privacy Awareness Training is required for all employees on an annual basis.



Privacy Act Statement

Authority: The Telework Enhancement Act of 2010 (December 9, 2010); Public Law 111-292, codified at 5 U.S.C. §§ 6501-6506.

Purpose: The information collected may be used to manage telework applications and conduct telework program evaluations and audits, and to contact EPA personnel for business purposes.

Routine Use: This information may be disclosed to Agency employees with a need to know, and pursuant to the Routine Uses outlined in the Privacy Act System of Records: Telework Application and Agreement Records, EPA-61, available at <https://www.govinfo.gov/content/pkg/FR-2013-03-04/html/2013-04927.htm>. For example, Routine Use disclosures may include, but are not limited to the following: disclosures to the Department of Labor regarding telework safety matters, pursuant to an applicable negotiated collective bargaining agreement(s), and to persons properly engaged in processing of an administrative grievance, complaint, claim, or appeal filed by an employee, to the extent necessary to carry out their authorized duties.

Disclosure: Providing this information is voluntary. However, failure to provide this information may prevent approval or further processing of your telework application/agreement.

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

Privacy Risk: Lack of auditing could risk exposing data.

Mitigation: EPA reviews system level access controls and give access to those with a need to know only.

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 information collected in the Telework application is required in support of EPA Policy and the Telework Enhancement Act of 2010. The application collects, uses, disseminates, or maintains information that is required under these authorities. Information provided by employees is utilized by EPA to manage the Telework program, make organizational decisions, ensure it is in compliance with Federal regulations, and to report statistics to OPM/OMB on a regular basis.

6.2 **How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes X No . 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.)**

Yes. The personal identifier used to retrieve records from the application will be the credentials from the user's PIV Card, which are outlined in Enterprise Identity and Access Management, EPA-62R SORN.

The use and retrieval of telework agreement records are covered by EPA-61 SORN, Telework Application and Agreement Records.

Telework form data entered by an employee will be available and retrievable in the following ways:

- 1) Employee can view their own data. They cannot retrieve any other records or data except their own.
- 2) Supervisor can view their own data and data of their employees. This data is determined by settings in Microsoft Entra ID. They aren't able to search and retrieve from the initiating database.

The information retrieved by the user for their own telework data will be accomplished by leveraging the platform level Entra ID capability to populate their own telework data based on querying the Entra ID information for this user.

Supervisory-level role will be provided access to their staff or organizational-level employee data based on identification of the supervisor by leveraging platform-level Entra ID capability to determine their identity, after which the hierarchy of data pertaining to them is returned constrained and filtered by these controls.

Any application-specific data is retrieved from the Dataverse instance itself and uses the above-mentioned method to determine identity and associated data access; all this is covered under the platform-level ATO.

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 evaluation was completed via exhaustive in-person interviews with application owner, Office of Human Resources key staff, telework coordinators, subsets of employees submitting telework data, agency senior leaders and key decision makers in understanding the current process for telework and how it implements awareness of privacy, and how we will continue to support this in the telework application.

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: When a supervisor has a change in position (go on detail), they may have

access to individuals' data when they should not.

Mitigation: OHR (including telework coordinators) follows a defined review process to verify agency assignments and initiate the update process to ensure that proper security controls are in place. All other roles are inherited from Microsoft Entra ID, rather than assigned by individuals to avoid human error in providing different levels of access.

***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.

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?

Individuals can choose to not complete the application process but then will be unable to participate in telework at EPA.

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: There is a risk that the Telework application does not provide notice to individuals.

Mitigation: OMS provides a PAS for the use of this application.



Privacy Act Statement

Authority: The Telework Enhancement Act of 2010 (December 9, 2010); Public Law 111-292, codified at 5 U.S.C. §§ 6501-6506.

Purpose: The information collected may be used to manage telework applications and conduct telework program evaluations and audits, and to contact EPA personnel for business purposes.

Routine Use: This information may be disclosed to Agency employees with a need to know, and pursuant to the Routine Uses outlined in the Privacy Act System of Records: Telework Application and Agreement Records, EPA-61, available at <https://www.govinfo.gov/content/pkg/FR-2013-03-04/html/2013-04927.htm>. For example, Routine Use disclosures may include, but are not limited to the following: disclosures to the Department of Labor regarding telework safety matters, pursuant to an applicable negotiated collective bargaining agreement(s), and to persons properly engaged in processing of an administrative grievance, complaint, claim, or appeal filed by an employee, to the extent necessary to carry out their authorized duties.

Disclosure: Providing this information is voluntary. However, failure to provide this information may prevent approval or further processing of your telework application/agreement.

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: This application does not provide additional redress abilities beyond the access and correction afforded under EPA's Privacy Act and FOIA processes.

Mitigation: N/A