



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

<b>System Name: Region 6 LAN/R6LAN</b>		<b>System Owner: Mark Huff</b>	
<b>Preparer: Jon Williams</b>		<b>Office: Region 6</b>	
<b>Date: 3/17/2026</b>		<b>Phone: 214-665-8026</b>	
<b>Reason for Submittal:</b>			
New: <input type="checkbox"/>	Revised: <input type="checkbox"/>	Annual Review: <input checked="" type="checkbox"/>	Rescindment: <input type="checkbox"/>
<b>System Lifecycle Stage(s):</b>			
Definition: <input type="checkbox"/>	Development/Acquisition: <input type="checkbox"/>	Implementation: <input type="checkbox"/>	
Operation & Maintenance: <input checked="" type="checkbox"/>		Rescindment/Decommission: <input type="checkbox"/>	
<p><b>Note:</b> 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 <a href="#">OMB Circular A-130, Appendix 1, Section (c) (1) (a-f)</a>.</p> <p>The PIA must describe the risk associated with that action. For assistance in applying privacy risk see <a href="#">OMB Circular No. A-123, Section VII (A) (pgs. 44-45)</a>.</p>			

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

R6LAN is EPA Region 6’s General Support System (GSS) that provides network connectivity for all Region 6 users, enabling access to both local IT resources and agency-wide EPA systems. As the regional network backbone, it integrates EPA-connected devices in Region 6 into the broader EPA IT environment. All connected equipment complies with EPA security controls, rules, and policies. The R6LAN does not directly collect personally identifiable information (PII); however, it supports systems that handle PII and therefore maintains and stores PII in accordance with EPA requirements.

## Section 1. 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?**

N/A – No information is being collected

- 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?**

Yes – R6LAN has an SSP. ATO expires January 31, 2027

- 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. 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).**

R6LAN does store CUI. For financial, business, and HR purposes this data is stored in locations with restricted access.

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

Multiple CBI data is from companies external to the EPA. HR data is related to Region 6 EPA personnel actions from various sources. Financial data from multiple programs and sources to include contracts, grants, and EPA business processes.

**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. We use publicly available and commercial data from multiple licensed or open government sources for the geospatial program and others.

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

Only verified data from reputed sources is used.

**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:**

Moderate

**Mitigation:**

Firewalls, required PIV authentication, encryption, access-control list. i.e. adherence to EPA privacy controls.

### Section 3. 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. Active Directory (AD) controls access. NTFS permission.

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

CIO 2150-P-01.2 Information Security – Access Control Procedure

**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?**

Region 6 Staff and Contractors

Yes.

**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.**

The system's EPA Records Control Schedule can be viewed at:

<https://usepa.sharepoint.com/sites/oei/ermd/nrmp/SitePages/schedules/final/index.aspx>

**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:**

Proper access not being ensured.

**Mitigation:**

Review user group membership and permissions

## Section 4. 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.

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

N/A

**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?**

N/A

**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:**

None

**Mitigation:**

None

## Section 5. 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?**

We ensure accessibility and operational status while adhering to CIO 2150-P-03.3 Information Security – Audit and Accountability Procedures.

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

The annual training on Privacy Awareness and CUI that is offered by the Agency is used as annual training to keep the users informed of the requirements.

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

Discuss the privacy risks associated with the technical and policy-based safeguards and security measures. How were those risks mitigated?

**Privacy Risk:**

None

**Mitigation:**

N/A

## Section 6. 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

List each use (internal and external to the Department) of the information collected or maintained. Provide a detailed response that states how and why the different data elements will be used. If Social Security numbers are collected, state why the SSN is necessary and how it was used.

The Region 6 GSS provides storage, accessibility, and control-of-access to Region 6 generated data.

### 6.2 How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier? Yes: 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.

N/A

### 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.

N/A

### 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 National Privacy Program (NPP) will determine if a System of Records Notice (SORN) is required. If so, the following additional sections will be required.

## Section 7. 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?**

Click or tap here to enter text.

### **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:**

Click or tap here to enter text.

#### **Mitigation:**

Click or tap here to enter text.

## Section 8. 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 Freedom of Information Act (FOIA).

**Privacy Risk:**

Click or tap here to enter text.

**Mitigation:**

Click or tap here to enter text.

I attest as the Agency Privacy Officer that **Region 6 LAN/R6LAN** Privacy Impact Assessment (PIA) has been reviewed. The privacy implications have been adequately identified with appropriate mitigation statements included for implementation in the development or use of information technology systems.

Respectfully,

Lee Kelly  
Agency Privacy Officer  
Cybersecurity Planning & Risk Mgmt Branch  
EPA/OFA