

PRIVACY IMPACT ASSESSMENT

(Rev 8/2026 – 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://work.epa.gov/privacy/senior-privacy-officials-staff-lpos>

System Name: Adobe Creative Cloud		System Owner: Scott Baker and Phillip Starke	
Preparer: Phillip Starke		Office: OFA/OCIO/ITOD/EUSB/Endpoint Services Branch (ESS)	
Date: 8/26/2026		Phone: 703-297-7190	
Reason for Submittal: Pursuing ATU for limited use of Adobe Creative Cloud Services			
New: ☒	Revised: ☐	Annual Review: ☐	Rescindment: ☐
System Lifecycle Stage(s):			
Definition: ☒	Development/Acquisition: ☐	Implementation: ☐	
Operation & Maintenance: ☐		Rescindment/Decommission: ☐	
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 OMB Circular A-130, Appendix 1, Section (c) (1) (a-f). The PIA must describe the risk associated with that action. For assistance in applying privacy risk see OMB Circular No. A-123, Section VII (A) (pgs. 44-45).			

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

Adobe Express is a cloud-first creative communications application within Adobe Creative Cloud that enables authorized EPA users to create, edit, collaborate on, and produce digital communications and outreach materials. The application supports the development of graphics, flyers, infographics, presentations, social media content, promotional materials, and other public-facing or internal communications products.

Adobe Creative Cloud services are enabled for a limited group of authorized Adobe Express users because cloud functionality is required to support core Express capabilities, including projects, templates, brand libraries, creative assets, and collaboration. Creative Cloud services remain disabled by

default for the broader EPA user population.

Adobe Express is not intended to serve as an EPA system of record or repository for sensitive agency information. Users are prohibited from storing sensitive or Moderate-impact information within Adobe Creative Cloud and are expected to maintain final agency records and work products in approved EPA repositories, as applicable. Limited user identity and account information is used to support authentication, authorization, licensing, and administration of the service.

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. Information is limited to information necessary for user authentication, account administration, authorization, and software licensing.

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?

N/A. Pursuing ATU. Adobe Creative Cloud is a FedRAMP-authorized cloud service at the Low impact level. EPA is currently evaluating the appropriate system boundary and agency authorization/ATU requirements for its use in support of Adobe Express.

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.

N/A.

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?

Yes. Adobe Creative Cloud is a cloud-based Software-as-a-Service (SaaS) offering and is FedRAMP authorized at the Low impact level. EPA's intended use is restricted to approved Adobe Express users. Users are prohibited from storing sensitive or Moderate-impact EPA information within the service.

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).

Limited user account information is processed, including name, EPA email address/user

identifier, organizational affiliation, Adobe/Federated ID, product entitlement, licensing, and account administration information. Adobe Express is not intended to collect or maintain sensitive PII.

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

User identity information originates from EPA's enterprise identity management environment and is provided through federated authentication/SSO and account provisioning. Additional information is generated through Adobe account and license administration.

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. The system does not use information from commercial sources or publicly available data.

2.4 Discuss how accuracy of the data is ensured.

N/A.

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:

No immediate risk identified.

Mitigation:

Access is limited to authorized Adobe Express users. Authentication is federated through EPA identity services, and only the minimum account information necessary for authentication, authorization, licensing, and administration is used. Users are prohibited from storing sensitive PII or Moderate-impact information within Adobe Creative Cloud.

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. Access is restricted to authorized users through EPA-managed identity authentication and Adobe licensing/entitlement controls. Adobe Creative Cloud services remain disabled by

default for the broader EPA user population and are enabled only for approved Adobe Express users.

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

Access controls are documented through applicable EPA security policies/procedures, Adobe enterprise administrative controls, and the Adobe Express Rules of Engagement/acceptable-use requirements.

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

Adobe administrators manage licensing, entitlements, and approved user access.

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?

Access is limited to approved EPA Adobe Express users and authorized administrators with a business need.

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.

Adobe Express is not intended to serve as an EPA system of record or records repository. Users are instructed to store final agency work products in approved EPA repositories in accordance with applicable EPA records retention requirements. Limited account and licensing information is retained as necessary to administer the service.

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:

No immediate risk identified.

Mitigation:

Adobe Creative Cloud is not authorized as the repository for sensitive EPA information or official records. Users are instructed to download final work products and maintain agency records within approved EPA repositories. Access is limited to authorized Adobe Express users.

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.

Adobe Express is used to create communications and outreach products that may ultimately be released publicly through approved EPA communication channels.

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

Public dissemination of approved communications products is consistent with the intended purpose of Adobe Express.

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:

No immediate risk identified.

Mitigation:

Access is restricted to approved users, sensitive and Moderate-impact information is prohibited, and users are required to follow established Rules of Engagement. Public-facing products are released through established EPA communication and approval processes.

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?

Use is controlled through restricted access, EPA federated authentication, Adobe administrative controls, license assignments, and established Rules of Engagement. Creative Cloud services remain disabled for users who are not approved for Adobe Express.

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

Users are subject to required EPA privacy, security, and information management training. Adobe Express users will also receive Rules of Engagement defining appropriate use and prohibiting storage of sensitive or Moderate-impact information within Adobe Creative Cloud.

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:

No immediate risk identified.

Mitigation:

Access is limited to an approved user group, users receive applicable privacy/security training and Rules of Engagement, authentication is managed through EPA identity services, and administrative access is restricted.

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.

Limited user identity and account information is used to authenticate users, provision Adobe Express access, assign licenses and entitlements, and administer the service. Adobe Express itself is used primarily to create public-facing communications, graphics, flyers, infographics, presentations, social media content, and other outreach or promotional materials. Sensitive PII is not required for these purposes and is prohibited from being stored within Adobe Creative Cloud.

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.

Adobe Express is not designed to retrieve records about individuals using a personal identifier. User identifiers are used for authentication, authorization, licensing, and account administration rather than retrieval of records about individuals.

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.

The system requires only limited user identity/account information for authentication and administration. Access is restricted to approved users, authentication is federated through EPA, and sensitive or Moderate-impact information is prohibited from storage within Adobe Creative Cloud.

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:

No immediate risk identified.

Mitigation:

Access is restricted to approved Adobe Express users, EPA-managed authentication is used, and Rules of Engagement prohibit storing sensitive PII or Moderate-impact EPA information within Adobe Creative Cloud.

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.

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. 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:

Mitigation:

I attest as the Agency Privacy Officer that **Adobe Creative Cloud** 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,

**ROBERT
KELLY**

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

Digitally signed by
ROBERT KELLY
Date: 2026.09.28
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