

PRIVACY IMPACT ASSESSMENT

(Rev 2/2026 – 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://usepa.sharepoint.com/:w:/r/sites/oei_Community/OISP/Privacy/LPODoc/LPO Roster.docx

System Name: Zoom for Government (ZOOMGov) Conferencing		System Owner: Fisseha Kefle	
Preparer: Fisseha Kefle (System Owner); Rotimi Adesanya (ISSO)		Office: OFA-OCIO-ITOD-EUSB	
Date: 05-05-2026		Phone: (W) 202-566-1459 (M) 301-617-4330	
Reason for Submittal:			
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:

Zoom for Government (ZoomGov) is a FedRAMP approved Software-as-a-Service (SaaS) Cloud-based conferencing service stored in AWS GovCloud maintained specifically for use by US Government users featuring ZoomGov Meetings and Chat, ZoomGov Video Webinar and ZoomGov Phone which allows participants to communicate as a group through use of audio and video and content sharing.

ZoomGov has all the same features within Zoom Commercial (Publicly offered Zoom service) but operates in a dedicated, secure infrastructure designed to meet the requirements of FedRAMP Moderate baseline and DOD Impact Level 2.

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?

The specific legal authority for this collection of information is 5 U.S.C. 301 “Departmental Regulations”, 8 U.S.C 1101, 1103, 1104, 1201, 1255, 1305, 3101 “Records Management by Federal Agency Heads.”

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?

ZoomGov has a completed system security plan with a signed ATO that is scheduled to expire on July 31, 2028.

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. ZoomGov is not covered by the Paperwork Reduction Act.

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, ZoomGov data is stored in the AWS GovCloud which is a FedRAMP approved SaaS.

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).

The ZoomGov service typically included the following information for each user:

- Account Type - (e.g., Pro, Business, Enterprise) – EPA will be purchasing Enterprise type licenses.
- Account Name - (e.g. Bob Smith)
- Account Alias (e.g. Bob’s account for seminars)
- Role: (e.g. Member, Admin, etc)

- Account Owner: Email Address
- Account # - ZoomGov generated #
- Meeting Capacity: the default number of attendees permitted for each call.
- Phone Number – (The number the user uses to connect to ZoomGov)

None of the above information is accessible or can be searched under a user's access, except for the name of an individual to invite or connect.

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

EPA will designate several account managers (Federal and Contractor staff) that will be able to assign licenses owned by EPA to users. These licenses will be assigned to users only upon a formal request from approved EPA federal staff. EPA's ZoomGov account managers will use data from other EPA data sources such as National Locator and MS Active Directory to collect information from ZoomGov users for the purpose of provisioning accounts and to help facilitate and manage EPA activity on the ZoomGov Platform.

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

ZoomGov does NOT use information from any commercial sources or publicly available data.

2.4 Discuss how accuracy of the data is ensured.

EPA has developed and implemented an Enterprise Identity Data Warehouse (eIDW) that is used for the provisioning and deprovisioning of users. This eIDW has structured arrangement where an authoritative data source is established for each data element and that data is replicated to other sources.

ZoomGov licenses do allow information to be collected for the purpose of provisioning users. Due to the nature of the system and the anticipated broad use of these services across the EPA, it is the responsibility of each user to ensure the accuracy of data at the time the data is created or used. System administrators ensure user information is accurate through a user request form submitted by the users and through authentication with the EPA Active Directory (AD) service and will not ensure accuracy of any specific data created or entered by the end users. Enterprise Single Sign-On (SSO) has been implemented for ZoomGov for authentication that helps validate EPA user login.

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:

Because ZoomGov contains the names of individuals, email addresses and phone numbers, there is a small risk that this type of PII could be viewed or potentially used for unintended purposes.

Mitigation:

ZoomGov protects the information through defence-in-depth security controls that can only be accessed by a few dedicated system administrators. Some of these security measures taken are:

- Limiting the host of ZoomGov sessions as the only person authorized to use these data elements for only setting up the meeting invites.
- Strictly limiting access to only authorized personnel who are required to perform official duties and by training users to not store or transmit unauthorized information through EPA security and privacy awareness training.
- All employees must complete Information Security and Privacy Awareness Training (ISPAT) within 60 days of hire and then annually as well as complete the Records Management training prior to being granted access to ZoomGov.
- All personnel also must review and sign the EPA Rules of Behavior.
- Any guest or individual not signed into meeting must be identified and will show in the participants list with an orange background behind their names.
- Training users to avoid sharing meeting links on social media, public outlets or using Personal Meetings ID (PMI) to host public events.
- Restricting the sharing of screens to only the meeting host.
- Managing meeting participants by locking the meeting down after the host has decided to start, to deny any new participants from joining.
- Requiring meeting participants to sign up for larger meetings, and shortly before the meeting scheduled time, the host will send the password and link to all registrants.
- Utilizing the ZoomGov waiting room feature, which is a virtual staging area, to require guests to explicitly be granted access.

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, there are access controls in place to prevent unauthorized users. Each user must have a ZoomGov license account and automatically has a system role assigned. The system role can be identified as either an owner, administrator, member, or user role administrator. These roles are associated with a default set of permissions, which cannot be changed for the owner or member. These permissions control what users can access and/or do when they sign into the ZoomGov web portal.

Role-based access control enables your account to have additional user roles. User roles can have a set of permission that allows access only to the pages a user needs to view or edit. In

addition, you can change the permissions of administrator system role.

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

<https://zoom.us/docs/doc/Zoom-Security-White-Paper.pdf>

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

No, there are no other components with assigned roles and responsibilities with ZoomGov outside of the roles provided in Section 3.1.

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?

External parties will not have access to the ZoomGov system data. This includes an outside agency or external companies/contractors. The appropriate FAR clauses for contractors are included in the contract.

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.

ZoomGov retains data in accordance with EPA Records Schedule 1012 – Information and Technology Management by retaining server logs for at least 12 months within their Splunk component and keeping records readily available online for 90 days.

Account owners can change the privilege to edit recordings using role management. If an account owner enables the privilege to edit recordings the associated users can edit users' cloud recordings including the ability to disable the auto delete setting. There isn't a privilege for specifically disabling the auto delete setting.

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:

There's a small risk that data is retained longer than required.

Mitigation:

Account owners and administrators can delete discretionary content such as cloud recordings and chat logs (text messages, photos, and files). Once an account owner or administrator deletes this content it cannot be retrieved. We have also lowered this risk by limiting the sensitivity of recorded information. Record control schedule is regularly reviewed.

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 governments, 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. Information is not shared outside of EPA as part of the normal agency operations for ZoomGov.

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

There is no external sharing.

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?

ZoomGov does not have any MOUs or Information Sharing Agreements (ISAs). No information is shared externally outside of EPA but if there becomes a need to establish new information sharing agreements, they will be managed in accordance with EPA procedures.

4.4 Does the agreement place limitations on re-dissemination?

Not Applicable, there are no agreements.

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:

There is no risk related to information sharing since there is no information shared outside the agency; therefore, no risk is incurred.

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?

EPA ensures that the practices stated in this PIA are followed by leveraging training, policies, rules of behavior, and auditing and accountability. EPA security specifications require auditing capabilities that log the activity of each user to reduce the possibility of misuse and inappropriate dissemination of information. All user actions are tracked via audit logs to identify audit information by user identification, network terminal identification, date, time, and data accessed. All EPA systems employ auditing measures and technical safeguards to prevent the misuse of data.

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

The US EPA implements a Rules of Behavior (ROB) for which all users must consent prior to being granted systems credentials for access. The system inherits the EPA implementation of User Information Security and Privacy Awareness Training (ISPAT) which is provided annually. In addition, all EPA personnel receive annual refresher cybersecurity training to educate them regarding the use and management of sensitive data.

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:

There's potential risk of unauthorized access to audit logs and attempts to modify audit logs.

Mitigation:

Zoom for Government CSP has configured Splunk, AWS CloudTrail, and Zabbix to only be accessible by authorized Zoom for Government personnel. This access is aligned with their job responsibilities and is approved and provisioned. Any unauthorized access attempts and unusual activity pertaining to log modification are logged and investigated by applicable Zoom for Government personnel and would be reported to EPA ZoomGov engineers or SMEs.

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 information for ZoomGov is collected from data sources such as EPA National Locator and MS Active Directory. An approved ZoomGov administrator will enter this data to initially establish an account for the EPA user. This process will provision an EPA license to that user. Only users that

have requested an account for ZoomGov and have been approved for use of the application will be entered into the ZoomGov system. Once a user is provisioned and set up with a ZoomGov account, the individual will enter information as needed to schedule and conduct ZoomGov meetings.

All information used and collected by ZoomGov is kept to a minimum and strictly only for the purpose of inviting ZoomGov users to attend a meeting.

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.

The system is designed to locate authorized registered ZoomGov users only for the purposes of scheduling and invitations to meetings. The system is not designed to retrieve old or previously attended meetings by personal identifiers.

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.

ZoomGov does not have a current system of records (SORN); however, a review of the system data has been fully identified and evaluated to determine the potential effect on the privacy of individuals. ZoomGov has physical, technical, and administrative controls in place to protect privacy of individuals and to limit access.

The ZoomGov application is hosted in a FedRAMP cloud-based infrastructure hosted within AWS (Amazon Web Services) in the US. The physical security capabilities of AWS data center meet or exceed the EPA capabilities. ZoomGov protects data in transit via TLS 1.2 using 256-bit Advanced Encryption Standard (AES-256).

Administrative controls such as requiring role-based training, signing EPA Rules of Behavior (RoB), and restricting access to very small, limited number of approved ZoomGov users and administrators and ZoomGov licenses.

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:

There is a low risk of inappropriate use or handling of the information necessary to establish or

attend ZoomGov meetings.

Mitigation:

All user actions are tracked via audit logs hosted in AWS to identify audit information by user identification, network terminal identification, date, time, and data accessed. ZoomGov users and administrators are required to sign EPA Rules of Behavior (RoB). If inappropriate use or handling of information is suspected, ZoomGov account owners and authorized ZoomGov users are required to immediately report it to EPA CSIRC within 1-hour of discovery in accordance with EPA policy and EPA ZoomGov established procedures.

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 **Zoom for Government (ZOOMGov) Conferencing** 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

**ROBERT
KELLY**

Digitally signed by
ROBERT KELLY

Date: 2026.09.28
11:58:52 -04'00'