

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: Assessment, Cleanup and Redevelopment Exchange System (ACRES)	System Owner: Kelly Gorini
Preparer: Kelly Gorini	Office: Office of Brownfields and Land Revitalization
Date: 1/22/21	Phone: 202-566-1702
Reason for Submittal: New PIA <input checked="" type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input type="checkbox"/> Rescindment <input type="checkbox"/>	
This system is in the following life cycle stage(s):	
Definition <input type="checkbox"/> Development/Acquisition <input type="checkbox"/> Implementation <input type="checkbox"/>	
Operation & Maintenance <input checked="" 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:

ACRES is an online performance tracking and reporting tool for the Brownfields Program. The data in ACRES is directly reported by EPA Brownfields Cooperative Agreement Recipients and approved by EPA Project Officers. The ACRES database is one of EPA’s most comprehensive database systems, tracking data back to brownfields pilot projects in the late 1990s. The system updates in real-time, allowing for up-to-date accomplishment reporting. The system also works with several other EPA Databases: Cleanups in My Community, Envirofacts, and the Facility Registry Service.

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?

The ICR for this system covers the collection of information from those organizations that receive cooperative agreements from EPA under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 42 U.S.C §9601 et seq. (1980), as amended by the Brownsfield Utilization, Investment, and Local Development (BUILD) Act (P.L. 115-141).

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 ACRES database and Java application are hosted at NCC and operate under the ATO of the NCC. The ATO expires 11-10-2023.

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.

Yes, EPA ICR No. 2104.07, OMB Control No. 2050-0192

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, Data is not maintained in a Cloud environment

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 ACRES database collects site specific information on all brownfields sites benefiting from EPA funding. Information includes site address, funding used on site, and information related to assessment, cleanup and redevelopment activities of the site. Each site is associated to a cooperative agreement recipient and an EPA project officer. The names of the recipient and project officer are stored in the system.

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

Initial cooperative agreement information is uploaded into ACRES from an Integrated Grants Management System (IGMS) data extraction. All remaining information is entered directly into the system by the cooperative agreement recipient themselves and/or the EPA project officer.

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

2.4 Discuss how accuracy of the data is ensured.

EPA project officers are required to review and approve all information entered by a cooperative agreement recipient. Following the project officer's review, a contractor does a second review, referred to as "National Program Review" prior to making the information available in ACRES.

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:

Risks include (business) contact names used for system registration that may be exposed. There are privacy risks once this information leaves the system boundary (for example, if forms were printed by system users).

Mitigation:

Individuals' names used as contacts for cooperative agreements are protected by controls intended for privileged users. These controls include assigning user rights to different types of users and limiting privileged user designations. EPA and cooperative agreement recipients have access to sites for the purposes of managing/implementing their brownfield cooperative agreement but "read" only access for sites not associated with their cooperative agreement. Participant users only have editable access to their own information and only through a login account associated to the user.

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, cooperative agreement recipients only have access to their individual project records in ACRES. EPA project officers can only edit information details for grants in their assigned Region.

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

User access roles as described in Section 3.1 are documented in the ACRES System Documentation.

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

There are administrative users that have access to all data in ACRES. These are limited to 1-2 individuals per Region.

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?

The ACRES IT Support Contract involves contractor support from LinTech. The appropriate clauses are included in the contract. All other users (EPA and Cooperative Agreement Recipients) must be granted access rights.

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 database collects information for EPA to track the cumulative impact of the Brownfields Program. .

The database collects property records to demonstrate the cumulative accomplishments of our program. Some of our most important data fields can't be reported until years after the initial property record is recorded in the system. The data is generated from EPA Brownfields Grants, and Targeted Brownfields Assessments conducted by an EPA contractor. The record schedule for ACRES is 0090 which is Administrative Support Databases. For disposition instructions ACRES follows record schedule number 1012 e, which states close when superseded, updated, replaced or no longer needed for current agency business. The disposition instructions are to destroy the records one year after file closure.

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 privacy risk is the potential of keeping records longer than their actual retention timeframe.

Mitigation:

The mitigation is that the record schedule is followed.

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

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?

None (N/A)

4.4 Does the agreement place limitations on re-dissemination?

None (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 (N/A)

Mitigation:

None (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?

All Cooperative Agreement Recipients are required to submit quarterly reports, summarizing accomplishments submitted to the ACRES database. EPA Project Officers review these reports for accuracy.

All information submitted directly into the ACRES database system is reviewed by EPA Project Officers and EPA Contractors for accuracy and consistency. The PO in his/her review will ensure that the information is being used in the purpose that it was collected for.

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

All EPA users and contractors must take ISPAT through EPA annually. Contractors are required to take two additional training courses annually, based on their role in the database. Contractors can choose any additional training to meet this requirement as long as it relates to their database role.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

Low risk of untimely/improper review

Mitigation:

Account restrictions and controls exist within the system. There are limited access rights depending on user role. The PO during his/her review will ensure that the information is being properly used.

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 Property Profile Form (PPF) is filled out in ACRES by cooperative agreement recipients. The PPF is approved with ICR every three years. The PPF asks grantees about their site-specific brownfields work completed using their cooperative agreement funding. The PPF collects property specific details, from which EPA pulls information to track six main measures: Properties Assessed, Properties Cleaned Up, Jobs Leveraged, Dollars Leveraged, Acres Made

Ready for Reuse, and Properties Made Ready for Reuse. These measures are reported annually to OMB and Congress as required by the Government Performance and Results Act.

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.)*

Data is retrieved using Cooperative Agreement ID numbers and/or using site specific ACRES ID numbers. Searches cannot be done using an individual's name. The cooperative agreement ID number is not linked to an individual's name.

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?

ACRES does comply with the privacy controls dictated by EPA's General ISSP that was required for ATO. We have implemented all of the administrative, physical, and technical controls required by that document to safeguard the individuals information.

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:

The information might be misused

Mitigation:

There are limited access rights depending on user role. The PO during his/her review will ensure that the information is being properly used.

***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

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?

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

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: