

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: Contract Laboratory Program Support System (CLPSS)	System Owner: Shari Myer
Preparer: Shari Myer	Office: OLEM/OSRTI/TIFSD/ASB
Date: 02/06/2025	Phone: (202)566-0865
Reason for Submittal: New PIA____ Revised PIA____ Annual Review_X____ Rescindment ____	
This system is in the following life cycle stage(s):	
Definition <input type="checkbox"/> Development/Acquisition <input type="checkbox"/> Implementation <input checked="" 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:

OLEM created the Contract Laboratory Program (CLP) to support EPA's Superfund program in line with the 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the 1986 Superfund Amendments and Reauthorization Act (SARA). Superfund is responsible for cleaning up some of the nation's most contaminated land and responding to environmental emergencies, oil spills and natural disasters to protect public health and the environment. Superfund CLP's mission is to provide

analytical data of known and documented quality to support the 10 EPA Regional Offices in their Superfund activities.

The Superfund's Contract Laboratory Program Support System (CLPSS) provides a centralized, automated infrastructure supporting sample management and quality assurance processes associated with the scheduling, analysis, evaluation, reporting, and payment of analytical services performed on Superfund site samples under the Contract Laboratory Program (CLP).

The CLPSS maintains a database and tracking systems to support activities associated with receiving, reviewing, and distributing laboratory deliverables; Superfund cost recovery; monitoring laboratory performance; and maintaining laboratory contract and invoicing information. The CLPSS is a FISMA reportable system and a CPIC medium investment. CLPSS is hosted in the EPA's Amazon Web Services (AWS) cloud environment. The CLPSS is operated and maintained under the Analytical Services Branch, Superfund Quality and Sample Support (QSS) Contract, 68HERH23D0001

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 Analytical Services Branch (ASB) manages the Contract Laboratory Program (CLP), providing a national network of commercial laboratories to deliver analytical data of known and documented quality to support of the EPA's Superfund program under the 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and 1986 Superfund Amendments and Reauthorization Act (SARA).
- The collection of information by the CLPSS is covered under the following contract clauses: Treatment of Confidential Business Information (EPAAR 1552.235-71) (APR 1984) & EPAAR 1552.235-76 (APR 1996); Release of Contractor Confidential Business Information (EPAAR 1552.235-79) (APR 1996); and Access to Confidential Business Information (EPAAR 1552.235-80) (OCT 2000).
- The Superfund's Contract Laboratory Program Support System (CLPSS) operates in accordance with the Office of Environmental Information Policy's EPA classification No: CIO 2134.0 with establishing objectives, responsibilities and procedures for preparation, review and clearances for Agency efforts to collect or obtain information from the public in support of the Agency mission.

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, the Superfund's Contract Laboratory Program Support System (CLPSS) has a Security Plan. The CLPSS was first granted the Authority to Operate (ATO) in November 2002. The current ATO was granted on December 22, 2022, and will expire on December 23, 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.

Information 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?

The Superfund's Contract Laboratory Program Support System (CLPSS) is hosted EPA's Office of Mission Support (OMS) FedRAMP-certified Amazon Web Services (AWS) 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 Superfund's Contract Laboratory Program Support System (CLPSS) collects, uses, disseminates, and maintains the Contract Laboratory Program's laboratory contract information, Superfund site sample information, and analytical data. The CLPSS collects and maintains the name of the person, work email address, work phone number for all users and sometimes cell phone numbers for some users requesting and receiving access to the system. No other Personally Identifiable (PII) is collected or maintained by the system.

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

The sensitivity of data exchanged is Confidential Business Data related to the Contract Laboratory Program's laboratory contractor and is not classified as sensitive. In the Superfund's Contract Laboratory Program Support System (CLPSS), the Contract Laboratory Program's laboratory contract information is entered from the EPA's Office of Acquisition Solutions contract award documentation; EPA Regional customers submit requests for Superfund site sample analytical services; and laboratory contractors submit

the analytical data and create invoices. The CLPSS transmits the invoice for payment to the Agency's approved payment system and the CLPSS receives approved payment records. The CLPSS user provides name, work email address, and work phone number when requesting a system account.

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.

The Superfund's Contract Laboratory Program Support System (CLPSS) has established protocols to ensure the data entered, received, and transmitted accurately. The CLPSS contractor maintains and follows established operating procedures, quality assurance protocols, authentication checks, and access permissions. The CLPSS system limits the possibility of incorrect information submission through drop down menu lists, where applicable, and allows for correction, deletion, and update to inaccurate or incomplete information. The CLPSS contains an application that performs quality control checks on laboratory data deliverables to ensure the accuracy of information received from the laboratory contractors.

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:

There is potential exposure to Personally Identifiable (PII) information.

Mitigation:

We deploy privacy controls from NIST SP 800-53 to secure PII. These include controls that employees are required to follow as described in the Superfund's Contract Laboratory Program Support System (CLPSS) Security Plan.

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. Each Contract Laboratory Program Support System (CLPSS) user account is independent. Each user must request access through a registration process and accept the Rules of Behavior. Each user account is defined by organization and CLPSS permissions are established relative to their organization and job functions, controlling access, and preventing misuse. The most restrictive rights are applied to the least level of privilege.

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

The procedure describing the Superfund's Contract Laboratory Program Support System's (CLPSS) user access management and approval process are described in the contractor's *EPA CLPSS Portal User Management* Standard Operating Procedure, CIS-3, dated April 2023.

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

Yes. Each user account is defined by organization and the Contract Laboratory Program Support System (CLPSS) permissions are established relative to their organization and job functions, controlling access. The most restrictive rights are applied to the least level of privilege.

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?

EPA personnel and contractors have access to the Superfund's Contract Laboratory Program Support System (CLPSS) data. The following Federal Acquisition Regulation (FAR) clauses 5 are incorporated in the EPA Superfund Quality and Sample Management (QSS) contract by reference: Project Employee Confidentiality Agreement (EPAAR 1552.227-76) (MAY 1994); Treatment of Confidential Business Information (EPAAR 1552.235-71) (APR 1984) & EPAAR 1552.235-76 (APR 1996); Release of Contractor Confidential Business Information (EPAAR 1552.235-79) (APR 1996) and Access to Confidential Business Information (EPAAR 1552.235-80) (OCT 2000).

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 and information are retained for 30 years following the record schedule for Superfund information. The Superfund's Contract Laboratory Program Support System (CLPSS) is documented under EPA Records Schedule 0089 (Title: Information Tracking Systems;

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. We review records retention schedules periodically to ensure information is not retained beyond the authorized period.

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.

There is no external sharing of Superfund's Contract Laboratory Program Support System (CLPSS) data outside of the EPA.

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?

Within EPA, information sharing occurs between the Superfund's Contract Laboratory Program Support System (CLPSS) and Contract Payment System (CPS) under an approved Interconnection Security Agreement (ISA). Analytical service invoice data is exchanged between the two systems and the data transmitted is Confidential Business Data. The EPA users are expected to protect and appropriately use CLPSS database and contractor users are expected to protect the CPS database in accordance with the Privacy Act & Trade Secret Act and the Unauthorized Access Act.

The sensitivity of data exchanged is Confidential Business Data related to the Contract Laboratory Program's laboratory contractor, and not classified as sensitive. No Personally Identifiable (PII) is transmitted or linked, reducing the sensitivity and risk resulting from disclosure.

4.4 Does the agreement place limitations on re-dissemination?

No.

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. There is no external sharing.

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 Superfund's Contract Laboratory Program Support System (CLPSS) contains internal controls, adheres to standard operating procedures, and maintains user access. The system records user activity, and automatically deactivates a user's account after 30 days of inactivity and removes a user's account after 180 days of inactivity. User accounts associated with an expired or terminated laboratory contract are removed without notification.

The CLPSS system administrator conducts auditable events weekly reviewing/analyzing results for inappropriate activity or unusual logon behavior using an automated log management tool. Immediate action is taken to address any suspicious activity. The list of auditable events is reviewed annually, as part of the assessment process, and when technology changes occur. The system will be continuously monitored, and a privacy impact assessment will be performed as needed.

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

The contractor operating the Superfund's Contract Laboratory Program Support System

(CLPSS) has a designated Chief Information Officer (CIO). The contractor requires all staff to complete annual Cybersecurity & Personal Data Privacy Awareness training and acknowledge the Contractor's User Access Agreement and Standard. The contractor's training provides information on understanding and protecting yourself from common security threats; identifying Personally Identifiable Information (PII) and understanding the importance of protecting it; and recognizing the signs of insider threat and what to do about it. The contractor's Ethics and Compliance Office (ECO) is responsible for ensuring and administering the policy, auditing compliance, and investigating violations of the policy. The contractor retains the training records and are available upon EPA request. In addition, the contractor's staff with access to the EPA network (IT security roles) are required annually to complete EPA's mandatory Information Security and Privacy Awareness Training. The training course is accessible through EPA's FedTalent learning management system.

5.3 Privacy Impact Analysis: Related to Auditing and Accountability

Privacy Risk:

Some risk of failure to audit.

Mitigation:

Account restrictions and controls are in-place within the system. Access rights are limited depending on user role. Audit logging is performed as required, with no PII in audit logs. Routine review for inappropriate activity or unusual logon behavior to be performed.

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 Superfund's Contract Laboratory Program Support System (CLPSS) supports the Contract Laboratory Program (CLP). The CLP provides a national network of commercial laboratories to deliver analytical data of known and documented quality to support of the EPA's Superfund program. The CLPSS collects, uses, disseminates, and maintains the Contract Laboratory Program's laboratory contract information, Superfund site sample information, and analytical data for use in Superfund decision making processes and enforcement actions.

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.)

Superfund's Contract Laboratory Program Support System (CLPSS) users retrieve data using a unique ID nomenclature (Case/Sample Delivery Group). The ID is alphanumeric and assigned to a Region, not an individual, at the time of the sample analysis request. From initiation of sample analysis request through invoicing and data retention, the data is collected, maintained and disseminated using the unique ID nomenclature.

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.]

User access to the Superfund's Contract Laboratory Program Support System (CLPSS) is defined by their organization (i.e., Region or Program) and CLPSS permissions are established relative to their organization and job functions. Data access is controlled by the organization requesting the analytical service and the contractor providing the analytical service. The CLPSS system administrator conducts auditable events weekly, reviewing/analyzing results for inappropriate activity or unusual logon behavior.

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:

Account restrictions and controls are in-place within the system. Access rights are limited depending on user role. Routine review for inappropriate activity or unusual logon behavior to be performed.

***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?

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?

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:

Mitigation: