

**U.S. Consumer Product Safety Commission  
PRIVACY IMPACT ASSESSMENT**

<b>Name of Project:</b>	In Home Drowning Public Service Announcement Plan
<b>Office/Directorate:</b>	OCM

**A. CONTACT INFORMATION**

<b>Person completing PIA:</b> (Name, title, organization and ext.)	Kathleen Reilly, Pool Safety Campaign Leader x7222
<b>System Owner:</b> (Name, title, organization and ext.)	Office of Communications
<b>System Manager:</b> (Name, title, organization and ext.)	Terry Bard, Director of Technology and Technical Services X7700

**B. APPROVING OFFICIALS**

	Signature	Approve	Disapprove	Date
<b>System Owner</b>  Kathleen Reilly	X _____			
<b>Privacy Advocate</b> Albert Anders, ITPP	X _____ Albert Anders			
<b>Chief Information Security Officer</b> Patrick Manley, ITTS	X _____ Patrick Manley			
<b>Senior Agency Official for Privacy</b> Mary James, SAOP  <b>System of Record?</b> _____ Yes _____ No	X _____ Mary James			
<b>Reviewing Official:</b> Patrick D. Weddle, AED, EXIT	X _____ Patrick D. Weddle			

**C. SYSTEM APPLICATION/GENERAL INFORMATION**

<b>1. Does this system contain any personal information about individuals?</b> (If there is <b>NO</b> information collected, maintained, or used that is identifiable to the individual, the remainder of PIA does not have to be completed.)	Yes. The goal of the project is to collect photos of young drowning victims and use these with their first names only and a very brief mention of the scenario or vessel in which they drowned. For example (most likely using text on the screen), the child's photo appears on the screen and the text reads: "Kevin, 18 months, drowned in a toilet"; "Elle, 2 years old, drowned in a backyard pond", etc. We expect to use six to 10 of these images although we may use more photos without identifying the individuals.
<b>2. Is this an electronic system?</b>	This will be a video and it will be posted electronically on our website, YouTube and disseminated to the media.

<b>D. DATA IN THE SYSTEM</b>	
1. What categories of individuals are covered in the system? (public, employees, contractors)	The public. We will solicit submissions through drowning prevention and other support groups from victims' families.
2. Generally describe what data/information will be collected in the system.	Photos, first names, age of the child, the scene or vessel (bathtub, toilet, home fountain, bucket, washing machine) in which the child drowned.
3. Is the source of the information from the individual or is it taken from another source? If not directly from individual, then what other source?	From the family of the victim.
4. How will data be checked for completeness?	N/A
5. Is the data current? (What steps or procedures are taken to ensure the data is current and not out-of-date?)	N/A
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	We do not expect to get a large sampling of submissions. Names of the families and their contact details will only be used for correspondence and approval purposes using an agency "Release" form. Correspondence will be done through email.
<b>E. ATTRIBUTES OF THE DATA</b>	
1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?	We believe that personal stories are very effective in moving the public to action. In this case, by showing the victims we are recommending that families take steps to make sure their home environments are safe for very young children.
2. For electronic systems, if the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? Explain.	Release forms and emails from consenting families will be kept in offline electronic files with controlled access.
3. How will the data be retrieved? Can it be retrieved by a personal identifier? If yes, explain and list the identifiers that will be used to retrieve information on the individual.	We will NOT use personal identifiers to store or retrieve data.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	Individuals receiving our email have no obligation to reply or to acknowledge receipt of our message.
<b>F. MAINTENANCE AND ADMINISTRATIVE CONTROLS</b>	
1. What are the retention periods of data in this system?	Indefinite. We are creating a video that will exist on our website and on other websites.
2. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?	We do not have a record retention schedule but we will keep in off line electronic files the emails from consenting families, and in office files, the release forms for use of photos.
3. For electronic systems, will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	No
4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?	The files will be stored in an off-line email folder and on the agency's internal G drive. The department files are only accessed by members of the Office of Communications and will be marked confidential.
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	No

<p><b>6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain</b></p>	<p>N/A</p>
<p><b>G. ACCESS TO DATA</b></p>	
<p><b>1. Who will have access to the data in the system?</b> (e.g., contractors, managers, system administrators, developers, other).</p>	<p>The videos will be posted online. Email address and release forms will be maintained by the Office of Communications.</p>
<p><b>2. What controls are in place to prevent the misuse of data by those having access?</b> (Please list processes and training materials.)</p>	<p>All department and agency employees take annual Privacy Act training. Only Office of Communications staff will be able to access this file, which will not have any identifiers on it.</p>
<p><b>3. Who is responsible for assuring proper use of the data?</b></p>	<p>Kathleen Reilly and the Office of Communications</p>
<p><b>4. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? Are contractors involved in the collection of the data? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?</b></p>	<p>No</p>
<p><b>5. Do other systems share data or have access to the data in the system? If yes, explain. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?</b></p>	<p>No. There is no interface.</p>
<p><b>6. Will other agencies share data or have access to the data in this system? If yes, how will the data be used by the other agency?</b></p>	<p>No</p>
<p><b>7. Will any of the personally identifiable information be accessed remotely or physically removed?</b></p>	<p>No</p>