

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

Name of Project:	PRISM
Office/Directorate:	FMPS

A. CONTACT INFORMATION

Person completing PIA: (Name, title, organization and ext.)	Donna Hutton, FMPS, x7009
System Owner: (Name, title, organization and ext.)	Donna Hutton, FMPS, x7009
System Manager: (Name, title, organization and ext.)	Donna Hutton, FMPS, x7009

B. APPROVING OFFICIALS

	Signature	Approve	Disapprove	Date
System Owner	 <hr/>	X		5/14/2014
Privacy Advocate Albert Anders, ITPP	 <hr/> Albert Anders			
Chief Information Security Officer Patrick Manley, ITTS	 <hr/> Patrick Manley			
Senior Agency Official for Privacy Mary James, SAOP	 <hr/> Mary James			
System of Record? xx Yes _____ No				
Reviewing Official: Patrick D. Weddle, AED, EXIT	 <hr/> Patrick D. Weddle			

C. SYSTEM APPLICATION/GENERAL INFORMATION

1. Does this system contain any personal information about individuals? (If there is NO information collected, maintained, or used that is identifiable to the individual, the remainder of PIA does not have to be completed.)	Yes
2. Is this an electronic system?	Yes

D. DATA IN THE SYSTEM	
1. What categories of individuals are covered in the system? (public, employees, contractors)	Contractors (this includes individuals when they are performing as government contractors)
2. Generally describe what data/information will be collected in the system.	Information on all companies, including those individuals to whom we have awarded a contract to sell goods or services to the Consumer Product Safety Commission, is retained in the PRISM database. The only information we would retain on individuals applies to the information they provide to us as their business information in their role as a business entity. All businesses in the system are associated with a tax identification number. If an individual uses their personal social security number as their tax ID, and their home address and phone number as their business address and phone number, then that data is in the system.
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?	Information is taken from the System for Award Management (SAM) database for name, address, and phone. The source of the tax ID is the contractor themselves. Most of the contractor business information in PRISM applies to commercial companies (as opposed to individuals) and is not PII, but we have treated information regarding individuals performing as contractors as PII. This applies only to those individuals and could include the social security number (when used as business tax ID), address, and telephone number when these contact points are used for business purposes. (Documents related to procurements from corporations, partnerships, or other such business entities are not considered to be included in the system of records.)
4. How will data be checked for completeness?	CPSC staff input contractor information directly from the SAM system into PRISM and verify that the data matches. Contractors provide their tax ID and CPSC staff ensure that information recorded in PRISM matches information provided by the contractor.
5. Is the data current? (What steps or procedures are taken to ensure the data is current and not out-of-date?)	Data is obtained from the SAM system. SAM integrates with an IRS database and ensures that the information is current. It is also updated annually in the SAM system. The tax ID is obtained shortly prior to the time of award and is current.
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	Data elements are described above. They are identified by name, address, telephone number and tax ID in the PRISM system. They are also clearly identified in a print out from the SAM system and retained in hard copy files.
E. ATTRIBUTES OF THE DATA	
1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed?	Data is relevant and necessary because it is used to identify the contractor to whom the contract is awarded by name and address. The tax ID is necessary to the Finance office for payment and IRS reporting purposes. The telephone number is used to contact the contractor for business purposes.
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.	The data will only be accessed on an as needed basis by FMPS and field employees awarding a contract or contacting the contractor business. Computer records are accessible only through the use of login and password, which are issued to those with a need to know.
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.	Records are not retrieved using PII. In the PRISM system, for example, we would never search by tax ID number. Records in the PRISM system are retrieved by the business name used by an individual or by the contract number assigned to their contract. Paper records are retrieved exclusively by contract number.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	The contractor business submits a proposal to provide goods or services to the Consumer Product Safety Commission. In order to be awarded a contract, they must register in SAM, which is a Government-wide system, providing their information, and they must provide their tax ID for Finance office purposes. They cannot be awarded a contract without providing this information but their participation as a contractor is entirely optional and voluntary.
F. MAINTENANCE AND ADMINISTRATIVE CONTROLS	
1. What are the retention periods of data in this system?	PRISM records are stored indefinitely. Hard copy contract retention is controlled by an internal policy.
2. What are the procedures for disposition of the data at the end of the retention period? How long will	Internal policy calls for contracts below \$3,000 to be retained for three years after payment, and for those above \$3,000 to be retained six years and 3 months after payment based on the Federal Acquisition Regulation for contract retention and

the reports produced be kept? Where are the procedures documented?	destruction. However, in 2013, when FMPS began to execute destruction, we were advised by Office of the Secretary to transfer records to NARA instead of destroying. Files were boxed and sent to NARA.
3. For electronic systems, will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	Yes. This system will provide the capability to locate information regarding individuals by name if they are performing as contractors. This applies only to those individuals and could include the social security number (when used as business tax ID), address, and telephone number when these contact points are used for business purposes.
4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?	There will be limited access to the information by CPSC employees. Only employees working on contracts will have access to the information. Electronic documents containing the PII will be stored on CPSC's network and will be encrypted and/or password protected.
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	Yes, this system operates under CPSC's existing System of Records Notice (SORN) governing contracts and procurements. CPSC-10, Procurements.
6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain	No.
G. ACCESS TO DATA	
1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	CPSC Office of Procurement staff, CPSC Finance Division staff, CPSC information technology contractors and other CPSC Offices that create contract awards in the PRISM system.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	CPSC staff and contractors regularly attends ethics training and must adhere to principles of ethical conduct, which specify the appropriate and inappropriate use of government information by Federal employees and contractors. CPSC Directives (Order No. 0760.2) require staff and contractors to protect PII and provide consequences for failure to adhere to the directives.
3. Who is responsible for assuring proper use of the data?	The information owner and the system manager share overall responsibility for protecting the privacy rights of individuals by following established Privacy Act guidelines.
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?	Yes, CPSC will use contractors to develop and support the PRISM application with limited access to the data and their access to the application will be monitor and control by CPSC Information Technology staff. No, the contractors are not involved in the collection of the data.
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?	No.
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?	No.
7. Will any of the personally identifiable information be accessed remotely or physically removed?	No.