

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

Name of Project:	CPSC Carbon Monoxide Poster Contest
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Office/Directorate:	OCM
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A. CONTACT INFORMATION

Person completing PIA: (Name, title, organization and ext.)	Monica L. Garcia, Office of General Counsel, x7071
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System Owner: (Name, title, organization and ext.)	Patty Davis, Public Affairs Specialist, OCM x7601
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System Manager: (Name, title, organization and ext.)	Patty Davis, Public Affairs Specialist, OCM x7601
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B. APPROVING OFFICIALS	Signature	Approve	Disapprove	Date
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System Owner	Patty Davis, OCM			
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Privacy Advocate	Bobby Sanderson, ISSO			
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Chief Information Security Officer	Patrick Manley, ITSO			
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Senior Agency Official for Privacy				
System of Record? __X__ Yes ____ No	Mary James, Director, ITPP			

Reviewing Official:	Ming Zhu, Acting AED, EXIT			
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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. CPSC initiated use of this system in 2014.

D. DATA IN THE SYSTEM

1. What categories of individuals are	Public
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covered in the system? (public, employees, contractors)	
2. Generally describe what data/information will be collected in the system.	First and last name of student contest entrant, grade level in school, state of residence, parent/guardian first and last name, parent address (including city, state) parent email address, phone number. CPSC's Office of Communications (OCM) will only collect social security numbers from the contest winners to process and report contest prize payment. OCM will collect the contest winners' social security numbers from the parent or guardian via phone. OCM will store all personal information in encrypted and password protected files.
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?	Self-disclosed general information supplied by parent/guardian or entrant. The parent/guardian must submit a "Contest Submission and Parental Consent Form" containing the information collection described in D(2), above, with the exception of social security numbers (which are only collected from contest winners). This information will be stored, maintained, and destroyed in accordance with this PIA.
4. How will data be checked for completeness?	Staff will check each entry to ensure all of the required information has been submitted with the poster. If information is missing, CPSC staff at staff's discretion may elect to contact the contest entrant to obtain additional information or may disqualify the poster, which will not be entered in the contest.
5. Is the data current? (What steps or procedures are taken to ensure the data is current and not out-of-date?)	Yes. Data will be supplied by contest entrants at the time of poster submission. If CPSC discovers that the contact information is incomplete or out of date, CPSC staff may, at its discretion, elect to contact the entrant to obtain current data.
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 and in CPSC's poster contest rules document.
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 to ascertain the contest entrant's eligibility (grade) and parent/guardian consent, as well as contact information if the contestant becomes one of the 10 winners.
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 CPSC employees who need to contact finalists and to issue prizes. It will be stored in a password-protected and encrypted file.
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.	The data will be retrieved by the contestant's name or by identifier assigned to the contestant's entry. During the contest's submission period, posters submissions and PII may be retrieved on CPSC's password-protected and encrypted Episerver database. After the contest is completed, the posters and PII will be stored on for two years in an encrypted and password-protected file after which the PII will be deleted.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	Entry to the contest is optional and the individual may choose not to enter the contest or choose to not provide contact information. Individuals must provide information and the parent/guardian must consent to the entrant's participation in the contest. If the individual does not provide the required information and consent, the contest entrant is not eligible to win the contest prize.

F. MAINTENANCE AND ADMINISTRATIVE CONTROLS

<p>1. What are the retention periods of data in this system?</p>	<p>Following the selection of contest winners, the database will be stored for a two-year period for records management purposes. Winning posters will be on display at CPSC in Bethesda, Md., for an indefinite period of time. OCM may retain the contact information for contest winners and/or the winners' parents/guardians for a longer period of time if CPSC continues to display the posters.</p>
<p>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 procedures documented?</p>	<p>After selection of contest winners, the electronic files containing contact information from any computer or network share where they are stored will be deleted after the proper storage period of two years. PII about the contest entrants will not be included in any reports. Any hard copies will be shredded.</p>
<p>3. For electronic systems, will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.</p>	<p>Yes. This system will provide the capability to locate an individual by name, grade, address of parent/guardian, including state, email, parent's name and contact information for the contest.</p>
<p>4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?</p>	<p>There will be limited access to the information by CPSC employees. Only employees working on the poster contest, accepting and posting posters and determining winners, will have access to the information. Electronic documents containing the PII will be stored in encrypted and password protected files.</p>
<p>5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?</p>	<p>Yes, this system operates under CPSC's existing System of Records Notice (SORN) governing contests. CPSC-31, Contests, Challenges and Award Programs.</p>
<p>6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain</p>	<p>CPSC published a Federal Register notice for modifications to CPSC's existing System of Records Notice (SORN) governing contests. Specifically, disclosing that the current contest will require collection of information about contest entrant's parent/guardian, grade in school, and contact information, including telephone number.</p>

G. ACCESS TO DATA

<p>1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).</p>	<p>Only those CPSC employees and contractors with knowledge of the password will have access to the data. CPSC contest judges will not have access to PII about contest entrants.</p>
<p>2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)</p>	<p>CPSC staff and contractors regularly attend 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.</p>
<p>3. Who is responsible for assuring proper use of the data?</p>	<p>The information owner and the system manager share overall responsibility for protecting the privacy rights of individuals by following established Privacy Act guidelines.</p>
<p>4. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? Are</p>	<p>Yes, CPSC uses contractors to build, operate and support the website that CPSC will use to announce the contest and collect contest entries containing personal identifying information. Yes, CPSC inserted clauses on "Restrictions on Use of Information" specifically</p>

<p>contractors involved in the collection of the data? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?</p>	<p>addressing Privacy Act information and personal identifying information to the contracts.</p>
<p>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?</p>	<p>No</p>
<p>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?</p>	<p>No</p>
<p>7. Will any of the personally identifiable information be accessed remotely or physically removed?</p>	<p>No</p>