

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

Name of Project:	PoolSafely.gov –forms for new website
Office/Directorate:	EXPA

A. CONTACT INFORMATION

Person completing PIA: (Name, title, organization and ext.)	Kathleen Reilly, Pool Safely Project Leader: x7222
System Owner: (Name, title, organization and ext.)	
System Manager: (Name, title, organization and ext.)	

B. APPROVING OFFICIALS

	Signature	Approve	Disapprove	Date
System Owner	8/11/2010 <u>X Kathleen Reilly</u> Kathleen Reilly	✓		
Privacy Advocate Linda Glatz, ITPP	8/17/2010 <u>X Linda Glatz</u> Linda Glatz	✓		
Chief Information Security Officer Patrick Manley, ITTS	8/12/2010 <u>X Patrick Manley</u> Patrick Manley	✓		
Senior Agency Official for Privacy Mary James, SAOP System of Record? Yes <input checked="" type="checkbox"/> No	8/16/2010 <u>X Mary James</u> Mary James	✓		
Reviewing Official: Patrick D. Weddle, AED, EXIT	8/16/2010 <u>X Patrick D. Weddle</u> 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. Personal stories from individuals sharing a personal or family incident about pool and spa mishap that could include close calls, near drownings, drownings, entrapments and related issues. These stories call also be positive. The goal is to collect stories that others can relate to and that encourage improved safety at pools and spas.
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)	The public.
2. Generally describe what data/information will be collected in the system.	First name only, state and email address.
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 individual about themselves or their immediate family member (child, parent, spouse, brother, sister, grandparent, aunt, uncle or cousin).
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 (What steps or procedures are taken to ensure the data is current and not out-of-date?)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. These are personal stories that could be from any time.
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	N/A
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?	The submitter's first name and first names of others in the story will lend a personal note. The location through identifying the state will add context. The goal is to have individuals share stories that relate an incident from which they learned about the importance of safety around pools and spas, thus alerting readers to potential hazards and encouraging more vigilant behavior around pools and spas.
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 be random and all submissions will be reviewed by EXPA staff and nothing will be posted until it is cleared by this staff and the submitter. Copy soliciting submissions will clearly state that the story, as approved by the submitter, will appear on a public website for the public to see. Data will be stored in a MySQL database on a secured server. Access to the data via Wordpress and network File share will be limited to authorized EXPA staff and systems administrators.
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.	Once cleared, the data will be posted on the PoolSafely.gov website. No. Data will be stored in a MySQL database on a secured server. Access to the data via Wordpress and network File share will be limited to authorized EXPA staff and systems administrators.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	Individuals will voluntarily submit information. If edits are made they will be sent back to the submitter for clearance before posting. If a submitter chooses, the information can be removed from the website at their request.
F. MAINTENANCE AND ADMINISTRATIVE CONTROLS	
1. What are the retention periods of data in this system?	Until a record retention schedule can be established, records will be kept indefinitely unless the submitter requests that their information be removed from the site.
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?	N/A EXPA can ask the submitter to indicate an end date, if required.
3. For electronic systems, will this system provide the capability to	No.

identify, locate, and monitor individuals? If yes, explain.	
4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?	The information will be clearly solicited for public use and sharing.
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	N/A
6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain	N/A
G. ACCESS TO DATA	
1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	Data will be posted on a public website. Original submissions will be kept by EXPA in an off line file. CPSC will not ask for any personal identifiers other than an email address.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	The data will be random and all submissions will be reviewed by EXPA and IT staff and nothing will be posted until it is cleared by this staff and the submitter. This information is for public consumption.
3. Who is responsible for assuring proper use of the data?	EXPA
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. Contractors are designing the template upon which the data "stories" will appear. They will not be handing the actual submissions for posting but might be asked to post the final approved (by CPSC and submitter) submission.
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?	There is no plan to share this data once collected.
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.