

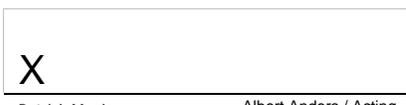
**U.S. Consumer Product Safety Commission
PRIVACY IMPACT ASSESSMENT**

Name of Project:	<i>OnSafety Blog</i> - Spanish Text Messaging Campaign
Office/Directorate:	Office of Communications

A. CONTACT INFORMATION

Person completing PIA: (Name, title, organization and ext.)	Carla Coolman, Public Affairs Specialist, OCM, x7568
System Owner: (Name, title, organization and ext.)	Scott Wolfson, Communications Chief, OCM, x7051
System Managers: (Name, title, organization and ext.)	Carla Coolman, Public Affairs Specialist, OCM, x7568

B. APPROVING OFFICIALS

	Signature	Approve	Disapprove	Date
System Owner Carla Coolman, OCM	 Carla Coolman Public Affairs Specialist			
Privacy Advocate Albert Anders, ITTPP	 Albert Anders IT Specialist	YES		3/24/16
Chief Information Security Officer Patrick Manley, ITTS	 Patrick Manley Supervisory IT Specialist Albert Anders / Acting	YES		3/24/16
Senior Agency Official for Privacy Mary James, EXIT System of Record? ____ Yes __x__ No	 Mary James Deputy AED, EXIT			
Reviewing Official: James Rolfes, CIO, EXIT	 James Rolfes CIO, EXIT	Yes		3/24/2016

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. CPSC invites Spanish-speaking consumers to request safety-related texts in Spanish. Consumers sign up on CPSC's web site or blog. The telephone numbers of consumers requesting such texts will be collected by CPSC's contractor.
2. Is this an electronic system?	Yes. CPSC's contractor will electronically gather phone numbers from persons who request that CPSC send them safety-related text messages in Spanish.

D. DATA IN THE SYSTEM	
1. What categories of individuals are covered in the system? (public, employees, contractors)	Members of the public who request safety texts.
2. Generally describe what data/information will be collected in the system.	Phone numbers only.
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?	Individuals seeking to receive safety texts provide phone numbers as part of a sign-up process; these individuals are the sole source of information.
4. How will data be checked for completeness?	The system is automated; users register online and unregister by sending a text code from their cell phones. We will not audit the phone information.
5. Is the data current? (What steps or procedures are taken to ensure the data is current and not out-of-date?)	We will not audit the phone information, but if a text message is undeliverable and the text "bounces back" to the contractor, we will eliminate these numbers.
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	No. The telephone numbers will be held in digital form by CPSC's contractor.
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?	CPSC wishes to improve its ability to provide safety information to Spanish speakers. Members of the public sign up online at CPSC's web site or blog. The phone numbers are necessary to provide the requested text messages.
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.	Data will not be consolidated. However, the phone number information will be password-protected to protect it from unauthorized access or use.
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 phone number data will not be catalogued or retrieved for review. There is no personal identifier. The data will be accessed in bulk by an automated SMS/MMS platform operated by CPSC's contractor, which will automatically "push" text messages containing safety information to those who request it.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	Individuals "opt in" by signing up online at CPSC's web site or blog. As such, information will be gathered only from individuals who affirmatively request it. As part of the process, members of the public are informed (in Spanish) that their phone information "will not be used for any purpose other than to provide you with product safety information from CPSC," and that the telephone number information "will not be shared or sold." Individuals may "opt out" at any time by sending a text stating "stop."
F. MAINTENANCE AND ADMINISTRATIVE CONTROLS	
1. What are the retention periods of data in this system?	Phone numbers provided by consumers are to be retained by the contractor only during the course of CPSC's Spanish-language safety texting campaign, and will be returned to CPSC at the end of the contract period. Texts and other information generated during the campaign will be retained permanently as "unscheduled records" per 36 C.F.R. 1225.16(c)(2).
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?	Upon completion of the contract, all telephone number information will be removed from the contractor's equipment including servers, computers, disc drives and other electronic equipment and storage media and returned to CPSC. Texts and other generated during the campaign will be retained permanently as "unscheduled records" per 36 C.F.R. 1225.16(c)(2).
3. For electronic systems, will this system provide the capability to identify, locate, and monitor	No. We will not audit the numbers, associate them with any individuals, or use the information to identify or locate individuals.

individuals? If yes, explain.	
4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?	Data is password protected so only authorized users have access. All authorized staff/contractors take mandatory annual Security and Privacy training and sign Rules of Behavior agreements.
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	No, information is not searched or retrieved by a personal identifier.
6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain	This is a new system. Because the information will not be "retrieved" for analysis or to identify individual consumers, a System of Records Notice ("SORN") is not required. If the program were expanded in the future to include email messaging, individually-targeted messages and emails, or two-way safety communications with consumers, SORN requirements would need to be revisited.
G. ACCESS TO DATA	
1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	System administrators and the CPSC contractor engaged to send the Spanish language texts on behalf of CPSC will have access to the data in the system.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	System administrators/contractors with access are required to take mandatory annual Security and Privacy training and sign Rules of Behavior agreements. Additionally, our contractor must agree in its contract that the phone number information collected (a) is the sole property of CPSC; (b) will be accessed only as needed to fulfill the contract; and (c) will not be maintained by the contractor beyond the life of the contract.
3. Who is responsible for assuring proper use of the data?	Office of Communications
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?	CPSC's contractor is involved with the design, development, and maintenance of the messaging system, and will maintain the phone numbers of consumers seeking to receive texts. CPSC's contractor must agree in its contract that: (a) it has no rights with respect to the phone number information collected; (b) the phone number data will be accessed only as needed to fulfill the contract; and (c) the contractor will return to CPSC all consumer phone number data at the end of the contract term.
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?	The telephone data will be maintained on the contractor's server with access limited to CPSC and contractor personnel working on the Spanish language texting program. The integrity and privacy of the texting system is the responsibility of the contractor throughout the performance of the contract. At the end of the contract term the contractor will return all consumer phone number data to CPSC.
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.