United States
Consumer Product Safety Commission

Privacy Threshold Analysis (PTA)/Privacy Impact Assessment (PIA)	
Name of Application/System:	Lab Accreditation Approval
Office/Directorate of System Owners:	Andrew Stadnik
Office/Directorate of Business Owners:	LS
Date:	8/26/2025
A. Contact Information	
Person Completing PTA/PIA: (Name, title, organization)	Kenneth Nguyen, Business Analyst, ITSD Eileen Menton, Business Analyst, ITSD
System Owner: (Name, title, organization)	Andrew Stadnik, Associate Executive Director for Laboratory Sciences, LS
System Manager/Technical POC: (Name, title, organization)	Pleshette Mattison, IT Project Manager CPIC Tingling Kuo, IT Specialist, ITSD
B. Approving Officials	
ANDREW STADNIK Digitally signed by ANDREW STADNIK Date: 2025.09.12 14:07:26 -04'00'	
Business Owner: Andrew Stadnik, LS	
ANDREW STADNIK Digitally signed by ANDREW STADNIK Date: 2025.09.12 14:07:47 -04'00'	
System Owner: Andrew Stadnik, LS	
KHALID NUMAN AL-HASSAN Digitally signed by KHALID NUMAN AL-HASSAN Date: 2025.09.16 09:20:44 -04'00'	
Chief Privacy Officer (CPO): Khalid Al-Hassan, EXIT	
KHALID NUMAN AL-HASSAN Digitally signed by KHALID NUMAN AL-HASSAN Date: 2025.09.16 09:21:06 -04'00'	
Chief Information Security Officer (CISO): Khalid Al-Hassan, EXIT	
ABIOYE MOSHEIM OYEWOLE Digitally signed by ABIOYE MOSHEIM OYEWOLE Date: 2025.09.12 14:24:18 -04'00'	
Assistant General Counsel, Division of Information Access: Abioye Mosheim Oyewole, GCIA	

Digitally signed by BRYAN BURNETT DN: c=US, o=U.S. Government, ou=Consumer Product Safety Commission, cn=BRYAN BURNETT, 0.9.2342.19200300.100.1.1=61001000009719 Date: 2026.06.15 22:21:19 -04'00'
Senior Agency Official for Privacy (SAOP): Bryan Burnett, EXIT

C. System of Records Notice	
1. Will the system or application maintain records that contain information about individuals? (Yes or No)	Yes
2. Will the system or application allow records to be retrieved by an individual's name or by some identifying number, symbol, or other identifier assigned to the individual? (Yes or No)	No
3. Will the records maintained by the system or application be considered a new collection of records? (Yes or No)	Yes
If the answers to Questions 1 and 2 are yes and you do not currently have a System of Records Notice (SORN), one will be required.	
D. Privacy Threshold Analysis (PTA)	
4. Will the information system or application be used to collect, store, or transmit personally identifiable information (PII)? (Yes or No)	Yes
5. Has a Privacy Impact Assessment (PIA) ever been performed for the information system or application? (Yes or No)	No
6. Is there a Privacy Act System of Records Notice (SORN) for this information system or application? (Yes or No)	No
If any of the answers to Questions 4 through 6 are "Yes" then complete the Privacy Impact Assessment (PIA) section (F) of this document. If the answers to Questions 4 through 6 are all "No" then a PIA is not needed. Complete section E below, sign form, and return to the Chief Privacy Officer.	
E. Omission of a Privacy Impact Assessment	

7. Briefly describe the information system or application and provide a supporting statement that explains why a PIA is not needed.	
F. Privacy Impact Assessment (PIA)	
8. Generally describe the type of information that will be collected, stored, or transmitted.	The fields that may contain PII include: Applicant/lab representative name, lab address, lab website, lab phone number, lab fax and lab email. *Personal home address, website, phone number, fax and email are not collected. This information is used to provide CPSC with the information needed to certify and third party, CPSC-accepted laboratories. Federal law requires that every children's product be tested by a third-party, CPSC-accepted laboratory for compliance with the applicable federal children's product safety requirements. CPSC has accepted more than 600 laboratories worldwide to perform testing for a variety of requirements for children's products. The specific testing required varies based on the product or product class, the intended age audience, consumer use patterns, and the product's material composition. Once a laboratory is approved it can request changes and is subject to periodic reviews of its status as an approved laboratory.
9. What categories of individuals are covered in the system? (For example, public, employees, contractors)	Representatives of third-party laboratories.
10. Is the personally identifiable information (PII) collected verified for accuracy? Why or why not?	CPSC does not verify PII for accuracy. PII is entered by the lab representative, therefore this information is assumed to be correct. Lab representatives can submit changes using the registration application or by contacting the lab accreditation team.
11. Is the PII current? How is this determined?	Currently it is provided by the lab representative.
12. Who will be responsible for protecting the privacy of the individuals whose PII is collected,	In accordance with CPSC policies and procedures, the IT Systems manager in conjunction with Information Techinology Security Officer and Records Liaison.

maintained, or shared in the system? Have policies and/or procedures been established for this responsibility and accountability?	
13. Is there a process for individuals to have inaccurate PII that is maintained by the system corrected or amended, as appropriate?	Yes, lab representatives can submit updates to their information via a specific button (Update representative or website information AND Other changes) on the registration form or contact lab accreditation team directly via email.
14. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?	The lab company representative who completed the lab registration form provides this information.
15. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	There is currently no process to decline to provide information or consent to use of the information. PII listed are all mandatory on the Lab Approval system, except for telephone number and website.
16. Do other systems that interconnect to the system share, transmit, or access the PII in the system? If yes, explain the purpose for system to system transmission, access, or sharing of PII.	Lab Registration, Lab Approval, and Lab Search are three separate databases. Lab information is entered into Lab Registration, and moves then to the Lab Approval system. Once approved, the information moves to Lab Search where it is made publicly available. The PII is included in the public lab search results to provide contact information for businesses to contact the labs.
17. What involvement will contractors have with the design and maintenance of the system? Has a contractor	Contractors support the application software. Yes, the Visual Information System (VIS) contractor signs an NDA.

confidentiality agreement or a Non-Disclosure Agreement (NDA) been developed for contractors who work on the system?	
18. What are the retention periods of PII for this system? Under what guidelines are the retention periods determined? Who establishes the retention guidelines?	The records are currently unscheduled; the records will be retained indefinitely until scheduled.
19. What are the procedures for disposition of PII at the end of the retention period? How long will any reports that contain PII be maintained? How is the information disposed? (For example, shredding, degaussing, overwriting)	The information for all lab applications is retained in the system even when the lab is no longer part of the approved list. The lab information is set as inactive. All historical information collected by the system has been retained.
20. Is this system currently identified as a CPSC system of records? If so, under which notice does the system operate?	No. Because the system does not retrieve data using PII it is not a Privacy Act system of records.
21. Who will have access to the data in the system? (For example, contractors, managers, system administrators, developers, other)	Designated LS staff, ITSD and Supporting Contractors
22. What controls are in place to prevent unauthorized access to the data?	Handled by internal Web App Security, that controls user roles and access.

23. What controls are in place to prevent the misuse of PII by those having access?	Handled by internal Web App Security, that controls user roles and access.
24. Is access to the PII being monitored, tracked, or recorded?	The PII is not being monitored, tracked or recorded.
25. For CPSC support staff, how is access to the PII determined? Are criteria, procedures, controls, and responsibilities regarding access documented? Does access to PII require manager approval?	Lab Reviewers are current CPSC staff trained in dealing with PII under agency training requirements. Lab Reviewers apply as an added duty function to the Lab Accreditation Program Manager (LAPM) and are selected based on their experience and recommendation from their supervisor. Through the application, interview and selection process, access to the LAS data is approved by the LAPM for new Lab Reviewers. Since it is an Other Duties/part time assignment (<8-10 hours/week), a Lab Reviewer's assignment may end based on other higher priority work for their office and/or reduced lab application workloads. The LAPM oversees training and mentoring of all Lab Reviewers including explaining the data content and PII contained within the LAS data. The LAPM meets with all Lab Reviewers at least twice per month to review specific lab application and/or system operational issues that arise.
26. What third-party organizations will have access to the PII? Who establishes criteria for what PII can be shared?	The system owner establishes what PII data can be shared.
27. What CPSC personnel roles will have access to PII fields? (For example, users, managers, system administrators, developers, contractors, other)	LS, ITSD and user roles (First Reviewer, Second Reviewer, Management and System Administrator).
28. Will any of the PII be accessed remotely or physically removed?	No