

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

Name of Project:	In Home Drowning Public Service Announcement Plan
Office/Directorate:	OCM

A. CONTACT INFORMATION

Person completing PIA: (Name, title, organization and ext.)	Kathleen Reilly, Pool Safety Campaign 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 Kathleen Reilly	<u>X</u>			
Privacy Advocate Albert Anders, ITTP	<u>X</u> Albert Anders	YES		9/26/12
Chief Information Security Officer Patrick Manley, ITTS	<u>X</u> Patrick Manley			
Senior Agency Official for Privacy Mary James, SAOP System of Record? <u> </u> Yes <u>X</u> No	<u>X</u> Mary James			
Reviewing Official: Patrick D. Weddle, AED, EXIT	<u>X</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. The plan is to collect photos of young drowning victims and use these with their photos and a very brief mention of the scenario or vessel in which they drowned. For example (most likely using text on the screen), the child's photo appears on the screen and the text reads: "Kevin, 18 months, drowned in a toilet"; "Elle, 2 years old, drowned in a backyard pond", etc. We expect to use six to 10 of these images although we may use more photos without identifying each individual.
2. Is this an electronic system?	This will be a video and it will be posted electronically on our website, YouTube and disseminated to the media.

D. DATA IN THE SYSTEM	
1. What categories of individuals are covered in the system? (public, employees, contractors)	The public. We will solicit submissions through drowning prevention and other support groups for victims' families.
2. Generally describe what data/information will be collected in the system.	Photos, first name, age of the child, the scene and vessel (bathtub, toilet, home fountain, bucket, washing machine) in which the child drowned.
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 family of the victim.
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
6. Are the data elements described in detail and documented? (If yes, what is the name and location of the document?)	We do not expect to get a large sampling of submissions. Names of the families and their contact details will only be used for correspondence and approval purposes using an agency "Release" form.
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?	We believe that personal stories are very effective in moving the public to action. In this case, by showing the victims we are recommending that families take steps to make sure their home environments are safe for very young children.
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.	There is no plan to collect data that would expose any individuals.
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.	We will use several email lists provided by a CPSC employee who lost a child to drowning. We will reach out to families who lost a child through an in home drowning. Our communication will ask for only the specific information that we intend to use. We will have respondents fill out our Release Form for Use of Photos (attached) and request that they state in their email that it is ok to use the child's name, age and the whereabouts of the drowning.
4. What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	Individuals receiving our email have no obligation to reply or to acknowledge receipt of our message.
F. MAINTENANCE AND ADMINISTRATIVE CONTROLS	
1. What are the retention periods of data in this system?	Indefinite. We are creating a video that will exist on our website and on other websites.
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?	We do not have a record retention schedule but we will keep in off line electronic files the emails from consenting families, and in office files, the release forms for use of photos.
3. For electronic systems, will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	No.
4. For electronic systems only, what controls will be used to prevent unauthorized monitoring?	N/A
5. Is this system currently identified as a CPSC system of records? If so, under which notice does the system	N/A

operate?	
6. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain	We will not ask for additional uses for the photos or other information. Our agreement will be for one use.
G. ACCESS TO DATA	
1. Who will have access to the data in the system? (e.g., contractors, managers, system administrators, developers, other).	The videos will be posted online. Email address and release forms will be maintained by the Office of Communications.
2. What controls are in place to prevent the misuse of data by those having access? (Please list processes and training materials.)	N/A
3. Who is responsible for assuring proper use of the data?	Kathleen Reilly and the Office of Communication
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?	No.
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?	We will not collect private information.
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?	N/A.
7. Will any of the personally identifiable information be accessed remotely or physically removed?	No