



PRIVACY IMPACT ASSESSMENT: ARPA-E – CMS  
PIA Template Version 5

|                                |                                     |
|--------------------------------|-------------------------------------|
| Affects Members Of the Public? | <input checked="" type="checkbox"/> |
|--------------------------------|-------------------------------------|

Department of Energy

Privacy Impact Assessment (PIA)

Guidance is provided in the template. See DOE Order 206.1, *Department of Energy Privacy Program, Appendix A, Privacy Impact Assessments*, for requirements and additional guidance for conducting a PIA: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

**Please complete form and return via email to [Privacy@hq.doe.gov](mailto:Privacy@hq.doe.gov)**

**No hand-written submissions will be accepted.**

**This template may not be modified.**

**MODULE I – PRIVACY NEEDS ASSESSMENT**

|   |  |   |
|---|--|---|
| <b>Date</b>                                     | 10/11/2024   |   |
| <b>Departmental Element &amp; Site</b>          | Advanced Research Projects Agency–Energy (ARPA-E)<br>Physical Server Location: EITS – hosted on the EITS Amazon Web Service (EITS-AWS E/W) Environment |   |
| <b>Name of Information System or IT Project</b> | System: Content Management System (CMS)  |   |
| <b>Exhibit Project UID</b>                      | N/A  |   |
| <b>New PIA Update</b>                           | POC Updates, Minor corrections and clarifications  |   |
|   | <input type="checkbox"/>   | <input checked="" type="checkbox"/>         |
|   | <b>Name, Title</b>   | <b>Contact Information<br/>Phone, Email</b> |
| <b>System Owner</b>                             | Shane Kosinski<br>ARPA-E, Deputy Director for Operations   | 202-287-1010<br>Shane.Kosinski@hq.doe.gov   |
| <b>Local Privacy Act Officer</b>                | Director of Privacy Management and Compliance Office of the Chief Information Officer, IM-42   | privacy@hq.doe.gov                          |



## MODULE I – PRIVACY NEEDS ASSESSMENT

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| <p><b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)</p> | <p>William Briggs<br/>ISSO, IM-63</p>   | <p>703-457-5705<br/>William.Briggs@hq.doe.gov</p> |
| <p><b>Person Completing this Document</b></p>   | <p>David Dixon<br/>ARPA-E Support Contractor, Project Manager</p>   | <p>202-287-1068<br/>David.Dixon1@hq.doe.gov</p>   |
| <p><b>Purpose of Information System or IT Project</b></p>                                 | <p>The ARPA-E CMS system is the content management system for the ARPA-E public-facing website located at <a href="http://arpa-e.energy.gov">http://arpa-e.energy.gov</a>. The site is built on the open-source Drupal platform and administered by staff from the ARPA-E Communications team with technical support from the ARPA-E Information Technology team. It is hosted in the Energy Information Technology Services (EITS) Amazon Web Services (AWS E/W) Cloud environment.</p> <p>The ARPA-E CMS system serves as the Agency’s primary conduit to members of the public, communicating vital information on Agency-wide activities (funding opportunities, events and workshops) to various stakeholder groups, including but not limited to entrepreneurs, investors, businesses, press/media, Congressional staff, educational institutions, scientists, students, and job seekers. ARPA-E stakeholders include current and past award recipients, future award applicants, the energy research community, policymakers (Congress and OMB), funders and other governmental partners.</p> <p>The projects listed on the site are ARPA-E organizations that have received ARPA-E awards. External organizations do not typically submit content. All content on the site is approved by the ARPA-E Communications team leadership. Media toolkits are developed by the ARPA-E Communications team in coordination with staff from across the agency. Members of the news media are an additional target audience, and the website offers media toolkits and other information suitable for download and publishing.</p> |   |
| <p><b>Type of Information Collected or Maintained by the System:</b></p>                  | <p><input type="checkbox"/> SSN <a href="#">Social Security number</a></p> <p><input type="checkbox"/> Medical &amp; Health Information <a href="#">e.g. blood test results</a></p> <p><input type="checkbox"/> Financial Information <a href="#">e.g. credit card number</a></p>   |   |



## MODULE I – PRIVACY NEEDS ASSESSMENT

- Clearance Information e.g. "Q"
- Biometric Information e.g. finger print, retinal scan
- Mother’s Maiden Name
- DoB, Place of Birth
- Employment Information
- Criminal History
- Name, Phone, Work Email address
- Other – Please Specify

**Has there been any attempt to verify PII does not exist on the system?**

No

*DOE Order 206.1, Department of Energy Privacy Program, defines PII as any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual’s identity, such as his/her name, Social Security number, date and place of birth, mother’s maiden name, biometric data, and including any other personal information that is linked or linkable to a specific individual.*

**If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)**

N/A

### Threshold Questions

**1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?**

Yes. Public biographic information for ARPA-E leadership.

Email addresses for newsletter distribution are collected but not displayed to the public.

The website publishes ARPA-E federal staff biographic



## MODULE I – PRIVACY NEEDS ASSESSMENT

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|   | information for the duration of their employment. The biographical data elements collected are limited to name, title, summary of position qualifications, and headshot/photograph. Biographic information is collected by the Comms Team and reviewed and approved by the individual staff before it is posted. |
| 2. Is the information in identifiable form?                   | Yes  |
| 3. Is the information about individual Members of the Public? | Yes  |
| 4. Is the information about DOE or contractor employees?      | Yes<br><input checked="" type="checkbox"/> Federal Employees<br><input type="checkbox"/> Contractor Employees  |

If the answer to **all** four (4) Threshold Questions is “No,” you may proceed to the signature page of the PIA. Submit the completed PNA with signature page to the CPO.

**Module II must be completed for all systems if the answer to any of the four (4) threshold questions is “Yes.” All questions must be completed. If appropriate, an answer of N/A may be entered.**

The goal of the threshold questions is to legitimately and efficiently determine whether additional assessment is necessary. If there is doubt, it is in the System Owner’s best interest to complete Module II.

PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.

## END OF PRIVACY NEEDS ASSESSMENT



## MODULE II – PII SYSTEMS & PROJECTS

### AUTHORITY, IMPACT & NOTICE

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|--|---|
| <p><b>1. AUTHORITY</b></p> <p><b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b></p>   | <p>42 U.S.C. §16538, as amended by America COMPETES Reauthorization Act of 2010 (P.L.111-358). Department of Energy Organization Act, 42 U.S.C. § 7101 <i>et seq.</i></p>   |
| <p><b>2. CONSENT</b></p> <p><b>What opportunities do individuals have to decline to provide information (e.g. where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?</b></p> | <p>Members of the the public who use the system are not required to enter personal information into the ARPA-E website. Email address information is collected for individuals to subscribe to ARPA-E’s newsletter. No additional identifying information is collected. This data input does not change the user experience at the web application layer nor provide authentication or authorization to any components of the CMS. Data contained in staff profiles is reviewed by staff members and ARPA-E obtains their consent to publish their biographic publicly releasable information and work email addresses.</p> |
| <p><b>3. CONTRACTS</b></p> <p><b>Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts?</b></p>  | <p>Yes. Contractors are involved with the design, development and maintenance of the system. Privacy Act clauses are included in their contracts. Contractors are subject to the requirements under the privacy Act, 5 U.S.C. § 552a and all DOE rules and regulations issued pursuant to Privacy Act.</p>  |



## MODULE II – PII SYSTEMS & PROJECTS

### 4. IMPACT ANALYSIS:

**How does this project or information system impact privacy?**

DOE has assessed the ARPA-E CMS system as a low risk system for confidentiality, integrity, and availability according to the criteria set forth in Federal Information Processing Standard (FIPS) 199 established by the National Institute of Standards and Technology (NIST). The risk rating is used to determine the effect to the agency should the system's confidentiality, integrity or availability be compromised.

All information about DOE employees in the system is made available to the public on the website. Much of this information is already made available to the public in other DOE websites (e.g., <https://arpa-e.energy.gov/about/team-directory>). Emails collected for newsletter distribution to members of the public are not linked to any other identifying information and are not published on the website.

While the ARPA-E CMS system contains some PII (name and work email addresses), the ensuing risk to the privacy of individuals is generally low as the focus of ARPA-E CMS is to manage content for the ARPA-E public-facing website located at <http://arpa-e.energy.gov/>.

This does not require or encourage collection of sensitive PII and is not driven by analysis of PII.



## MODULE II – PII SYSTEMS & PROJECTS

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| <p><b>5. SORNs</b></p> <p><b>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</b></p> <p><b>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</b></p> | <p>No. PII is not retrievable by the system. Email addresses are used to distribute an ARPA-E newsletter and are not linked to any identifying information. Newsletter email addresses are not displayed or retrievable on the website. Biographic information about ARPA-E staff is publicly releasable. Biographic information on all new federal staff members is collected and posted for publication on the ARPA-E website to help stakeholders - such as press/media, investors, and technologists - identify the skills and resources the Agency possesses and give a clear picture of the Agency’s capabilities and technical focus areas.</p> <p>This information is standard work-related biographic information about Federal staff of the agency. The Federal staff consent to have this information listed on the website. This is similar to information about leadership found on energy.gov for other program offices. The information is needed to convey the qualifications of the federal leadership team to the public</p> |
| <p><b>6. SORNs</b></p> <p><b>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</b></p> <p><b>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</b></p>                                       | <p>No</p>  |
| <p><b>7. SORNs</b></p> <p><b>If the information system is being modified, will the SORN(s) require amendment or revision?</b></p>   | <p>N/A</p>   |
| <p><b>DATA SOURCES</b></p>  |  |
| <p><b>8. What are the sources of information about individuals in the information system or project?</b></p>  | <p>Provided by individuals.</p>  |



## MODULE II – PII SYSTEMS & PROJECTS

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| <p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>  | <p>No</p>  |
| <p><b>10. Are the data elements described in detail and documented?</b></p>   | <p>Yes. Data elements in the CMS system are documented in a database schema.</p>   |
| <p><b>DATA USE</b></p>  |  |
| <p><b>11. How will the PII be used?</b></p>   | <p>Biographic information about ARPA-E federal staff is used to convey the capabilities of the staff to the public. The elements include educational qualifications, prior work experience and a description of their current role within the agency. Email addresses are used to distribute a newsletter to individuals interested in receiving information about ARPA-E news and events.</p> |
| <p><b>12. If the system derives meta data, how will the new or meta data be used?</b><br/><br/> <b>Will the new or meta data be part of an individual's record?</b></p> | <p>N/A</p>   |
| <p><b>13. With what other agencies or entities will an individual's information be shared?</b></p>  | <p>None</p>  |
| <p><b>Reports</b></p>   |  |
| <p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>   | <p>None</p>  |
| <p><b>15. What will be the use of these reports?</b></p>  | <p>N/A</p>   |
| <p><b>16. Who will have access to these reports?</b></p>  | <p>N/A</p>   |





## MODULE II – PII SYSTEMS & PROJECTS

### Monitoring

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| <p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p> | <p>No</p>  |
| <p><b>18. What kinds of information are collected as a function of the monitoring of individuals?</b></p>           | <p>N/A</p> |
| <p><b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>                       | <p>N/A</p> |

### DATA MANAGEMENT & MAINTENANCE

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| <p><b>20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records.</b></p> | <p>Biographic information about ARPA-E Federal Staff is reviewed and approved by the individuals and updated by ARPA-E Communications staff. Accuracy of email addresses provided for the newsletter are the responsibility of the individuals who sign up for the mailing list.</p> |
| <p><b>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</b></p>  | <p>N/A</p>   |

### Records Management



## MODULE II – PII SYSTEMS & PROJECTS

### 22. Identify the record(s).

- ARPA-E postings to its public website of information released or captured elsewhere and captured as website content
- Public correspondence and communications not requiring formal action: Projects section: Search Projects page
- Public outreach materials: copies of records used for reference in preparing products, drafts and working copies, preliminary artwork or graphics, checklists, and indexes of agency publications
- Transitory and Intermediary Records: Previous month's newsletters
- Transitory and Intermediary Records: Expired Job Announcements
- Transitory and Intermediary Records: Expired Funding Opportunities Announcements
- Transitory and Intermediary Records: Expired Funding Opportunity Notices
- Transitory and Intermediary Records: Expired News and blog postings
- Transitory and Intermediary Records: Expired Closed Funding Notices
- Transitory and Intermediary Records: Postings to the website that no longer contain current or accurate information
- Information technology operations and maintenance records
- System access records
- Information technology operations and maintenance records



## MODULE II – PII SYSTEMS & PROJECTS

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| <p><b>23. Identify the specific disposition authority (ies) that correspond to the record(s) noted in no. 22.</b></p>  | <p>Check appropriately and cite as required.</p> <p><input type="checkbox"/> Un-scheduled X Scheduled (cite NARA authority(ies) below)</p> <p>GRS 3.1, item 020 (DAA-GRS2013-0005-0004)<br/>           GRS 3.2, item 031 (DAA-GRS2013-0006-0004)<br/>           GRS 5.2, item 020 (DAA-GRS2017-0003-0002)<br/>           GRS 6.4, item 020 (DAA-GRS2016-0005-0002)<br/>           GRS 6.4, item 030 (DAA-GRS2016-0005-0003)</p> |
| <p><b>24. Records Contact</b></p>  | <p>Hai Duong, 202-287-6583, <a href="mailto:hai.duong@hq.doe.gov">hai.duong@hq.doe.gov</a><br/>           Rob Brown, 202-287-1011, <a href="mailto:rob.brown@hq.doe.gov">rob.brown@hq.doe.gov</a></p>   |
| <p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>  |   |
| <p><b>25. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>  | <p>Access Controls are in place to protect the data from unauthorized access, modification, or use. The system owner has implemented and tested all baseline NIST 800-53 Rev 4 security controls appropriate to its FIPS categorization of low in accordance to the DOE directives</p>  |
| <p><b>26. Who will have access to PII data?</b></p>  | <p>Federal and Contractor employees with business need and responsibilities for maintenance of the system.</p>  |
| <p><b>27. How is access to PII data determined?</b></p>  | <p>Based on granted access permissions after determination of valid need-to-know. Access requests are approved by the system owner</p>  |
| <p><b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b></p>   | <p>No</p>   |
| <p><b>29. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected?</b></p> | <p>N/A</p>  |



## MODULE II – PII SYSTEMS & PROJECTS

30. **Who is responsible for ensuring the authorized use of personal information?**

The System Owner is responsible for ensuring appropriate use of the personal information contained within CMS.

**END OF MODULE II**



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PIA Template Version 5

| SIGNATURE PAGE                                   |   |       |
|--|---|-------|
|  | Signature   | Date  |
| <b>System Owner</b>                              | <p style="text-align: center;"><b>Shane Kosinski</b></p> <hr/> <p><b>(Print Name)</b></p> <hr/> <p><b>(Signature)</b></p> | <hr/> |
| <b>Local Privacy Act Officer</b>                 | <hr/> <p><b>(Print Name)</b></p> <hr/> <p><b>(Signature)</b></p>  | <hr/> |
| <b><i>Ken Hunt</i><br/>Chief Privacy Officer</b> | <p style="text-align: center;"><b>Ken Hunt</b></p> <hr/> <p><b>(Print Name)</b></p> <hr/> <p><b>(Signature)</b></p>       | <hr/> |