Department of Energy

Privacy Impact Assessment (PIA)

Affects Members Of the Public?	

MODULE I – PRIVACY NEEDS ASSESSMENT	
Date	February 18, 2022
Departmental Element & Site	SC/BNL
Name of Information System or IT Project	Galaxy Digital – Get Connected
Exhibit Project UID	BNL PO 0000403994
New PIA [X] **Update** [ ]	

	Name, Title	**Contact Information Phone, Email**
System Owner	David Manning Director, Stakeholders and Community Relations Office	631-344-4747 dmanning@bnl.gov
Local Privacy Act Officer	Miriam Bartos	(630) 252-2041 Miriam.bartos@science.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Ian Ballantyne, ISSM	(631) 344-7589 ballant@bnl.gov

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Person Completing this Document	Eric Hanson Adv. Technology Engineer	(631)-344-8603 ehanson@bnl.gov
Purpose of Information System or IT Project	BNL's Stakeholders and Community Relations Office is responsible for coordinating volunteers for various events that the lab holds including Summer Sundays and United Way events. Galaxy Digital Get Connected (GDGC) provides a unified platform to connect with and schedule volunteers for these opportunities. This platform allows volunteers and the organization to track donated hours and determine community impact in the aggregate. The system contains low sensitivity administrative PII and low sensitivity volunteer activity data. Contact information will be used to schedule volunteers for various lab sponsored community events. Individuals may export their volunteer hours for personal or professional use.	
Type of Information Collected or Maintained by the System:	☐ SSN ☐ Medical & Health Information ☐ Financial Information ☐ Clearance Information ☐ Biometric Information ☐ Mother's Maiden Name ☐ DoB, Place of Birth ☐ Employment Information ☐ Criminal History ☒ Name, Phone, Address (zip code only) ☒ Other – Email Address, BNL Department/Division, and non-sensitive information such as preferred volunteer opportunity type.	
Has there been any attempt to verify PII does not exist on the system? **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*	PII exists.	

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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
2. **Is the information in identifiable form?**	Yes
3. **Is the information about individual Members of the Public?**	No
4. **Is the information about DOE or contractor employees?**	☒ Federal Employees ☒ Contractor Employees

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE	
1. **AUTHORITY** **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	42 USC 7101

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2. CONSENT **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)?**	Collection of the information is voluntary and consensual. Should an individual decline to provide required information, the individual may not be able to participate in BNL sponsored volunteer opportunities.
3. CONTRACTS **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?**	Yes. Contractors operate this system, and the Department of Energy Privacy Program CRD and Privacy Act clauses are included in the prime contract.
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	GDGC presents a low privacy impact. The system contains low sensitivity administrative PII including basic contact information used for purely administrative purposes, to wit: to register individuals for volunteer opportunities. In addition, the system contains low sensitivity volunteer data including volunteer opportunity preferences and donated hours. Should information in the system be compromised it would likely cause minimal harm to individuals, as the information is low sensitivity and likely perceived as qualitatively positive. The system observes a number of protections to protect privacy as reflected in the Fair Information Practice Principles (FIPPs). PII is provided by consenting individuals to further individual participation and transparency. PII is limited to clearly defined business purposes and is only visible to lab staff that coordinate the volunteer program. The system does not collect more PII than what is needed for specified business purposes in furtherance of data minimization. A series of administrative and technical controls are implemented to ensure that the use of PII is protected. Individuals have access to and manage their own profile data to ensure the accuracy and currency of their PII as well as to further individual participation.

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5. SORNs **How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?** **If yes, explain, and list the identifiers that will be used to retrieve information on the individual.**	PII can be retrieved by unique identifier.
6. SORNs **Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?** **If "Yes," provide name of SORN and location in the *Federal Register*.**	PII in the system is administrative in nature and used for exclusively administrative purposes and therefore falls under the administrative use exception.
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	N/A

DATA SOURCES

8. What are the sources of information about individuals in the information system or project?	All data is provided by the individual.
9. Will the information system derive new or meta data about an individual from the information collected?	The system aggregates volunteer hours per individual for use by the individual.
10. Are the data elements described in detail and documented?	Yes, in the system data schema.

DATA USE

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11. How will the PII be used?	Information will be used to schedule volunteers for various lab sponsored community events. Individuals may export their volunteer hours for personal or professional use.
12. If the system derives meta data, how will the new or meta data be used? **Will the new or meta data be part of an individual's record?**	Individuals registered in the system will be able to export their number of volunteered hours for personal or professional use.
13. With what other agencies or entities will an individual's information be shared?	Contact information will be shared as needed with approved 3rd parties involved with running a specific event exclusively for the administration of the event.

REPORTS

14. What kinds of reports are produced about individuals or contain an individual's data?	Reports may include number of volunteered hours in the aggregate for BNL as an organization and by department, top volunteers and their number of hours volunteered, and specific volunteers by event. Lists of volunteers by event will contain only the necessary information to suit the purpose of the list, but may contain first name, last name, phone, email, and zip code.
15. What will be the use of these reports?	These reports will be used to quantify community impact, determine individuals that could be recognized by number of service hours, and assist in identifying potential volunteers for new events.
16. Who will have access to these reports?	Only Stakeholders and Community Relations Office Staff will have the ability to generate the reports. They may provide relevant lists of individuals who've volunteered in the past to select BNL staff coordinating and/or seeking to increase volunteers for a given event. They may provide BNL management with reports on hours donated in the aggregate or by individuals for recognizing individuals who've donated significant amounts of their time. They may provide lists of individuals volunteering for a given event to the charitable organization sponsoring the event in order to receive credit for participation on behalf of BNL.

MONITORING

17. Will this information system provide the capability to identify, locate, and monitor individuals?	No. GDGC provides no monitoring capabilities beyond what may be derived from basic contact and event information.

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18. What kinds of information are collected as a function of the monitoring of individuals?	N/A
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A
DATA MANAGEMENT & MAINTENANCE	
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.	Individuals registered in the system are responsible for keeping their profile information up to date using the edit profile function. They are also responsible for checking into and out of events to ensure that their hours donated are accurately tallied.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A
RECORDS MANAGEMENT	
22. Identify the record(s).	Individual volunteers, their contact information, and volunteer activity data.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	GRS 6.4.010 Public affairs program records. GRS 2.2, item 110.
24. Records Contact	Lauren Heller lheller@bnl.gov 631-344-7692
ACCESS, SAFEGUARDS & SECURITY	
25. What controls are in place to protect the data from unauthorized access, modification or use?	Data is encrypted in transit and at rest. Platform is hosted in AWS which maintains various certifications for their environment. Administrative access of the platform is limited to Stakeholders and Community Relations.

PRIVACY
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26. Who will have access to PII data?	Stakeholders, Community Relations, and approved third parties involved in volunteer events as needed for the administration of volunteer events.
27. How is access to PII data determined?	Administrator access is granted on a need-to-know basis.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	No.
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?	N/A
30. Who is responsible for ensuring the authorized use of personal information?	Administrators including Stakeholders and Community Relations.

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
System Owner	_____ (Print Name) _____ (Signature)	_____
Local Privacy Act Officer	_____ (Print Name) _____ (Signature)	_____
Ken Hunt **Chief Privacy Officer**	_____ (Print Name) _____ (Signature)	_____