



Affects
 Members
 Of the Public?

Department of Energy

Privacy Impact Assessment (PIA)

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	May 2, 2023
Departmental Element & Site	SC/BNL
Name of Information System or IT Project	Perceptyx - Culture and Engagement Survey Platform
Exhibit Project UID	DE-SC0012704
New PIA <input checked="" type="checkbox"/>	This is a new PIA for a new cloud service.
Update <input type="checkbox"/>	

	Name, Title	Contact Information Phone, Email
System Owner	Jack Anderson, Deputy Director for Operations Robert Gordon, Brookhaven Site Manager	(631) 344-7474 janderson@bnl.gov (631) 344-3346 Robert.Gordon@science.doe.gov
Local Privacy Act Officer	Miriam Bartos, FOIA/Privacy Act Officer	(630) 252-2041 Miriam.bartos@science.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	James Fung, Acting ISSM	(631) 344-8403 jfung@bnl.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

<p>Person Completing this Document</p>	<p>Claudine Cangiano, Organizational Change Management Specialist</p> <p>Eric Hanson, Adv. Technology Engineer</p>	<p>ccangiano@bnl.gov (631)-344-8797</p> <p>(631)-344-8603 ehanson@bnl.gov</p>
<p>Purpose of Information System or IT Project</p>	<p>Perceptyx will be used to conduct lab wide staff engagement surveys, employee lifecycle surveys including onboarding and exit, and ad-hoc surveys to gather information from a specific department or group. The summarized data will be available to lab management and human resources (HR) through ready-made and custom reports.</p> <p>An optimal Brookhaven Science Associates (BSA) workplace culture will enable the development of organizational structures and processes that support the Lab as well as attract and retain the best talent. The Perceptyx Platform and associated professional services will enable BSA to continue to assess workplace culture and employee experience, identify opportunities, and measure progress.</p>	
<p>Type of Information Collected or Maintained by the System:</p>	<p><input type="checkbox"/> SSN</p> <p><input type="checkbox"/> Medical & Health Information</p> <p><input type="checkbox"/> Financial Information</p> <p><input type="checkbox"/> Clearance Information</p> <p><input type="checkbox"/> Biometric Information</p> <p><input type="checkbox"/> Mother's Maiden Name</p> <p><input type="checkbox"/> DoB, Place of Birth</p> <p><input checked="" type="checkbox"/> Employment Information- Life number, job title, job req, grade, grade description, Employment status (FLSA, Full/Part, Reg/Temp), Appoint. type, Org dept, Dept (workgroup), Rating, Union, Yrs of Service, Yrs of Service group, Hire date, Termination date, Trigger date, ALD Name, Supervisor/Supv ID</p> <p><input type="checkbox"/> Criminal History</p> <p><input checked="" type="checkbox"/> Name, Phone, Address (Name, Email address)</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

Other -Gender, Education level, education group, Degree, Age range, Ethnicity, Ethnic group

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 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.

PII exists on the system.

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 (However, output reports are aggregated summaries only)

3. Is the information about individual Members of the Public?

No

(If "Yes," place an "X" in the box at the top of first page.)

Member of the Public refers to individuals in a non-employee or DOE contractor context. *Members of the Public* includes individuals for whom DOE maintains information, as required by law, who were previously employed or contracted by DOE

4. Is the information about DOE or contractor employees?

Yes

Federal Employees

Contractor Employees



MODULE I – PRIVACY NEEDS ASSESSMENT

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

<p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<p>42 USC Section 7101</p>
<p>2. CONSENT</p> <p>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)?</p>	<p>Transfer of information into Perceptyx from the Human Resource Information System is a condition of employment. Individuals may decline to respond to surveys.</p>
<p>3. CONTRACTS</p> <p>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?</p>	<p>Yes, contract with manufacturer, Perceptyx. Contractors operate this system and the Department of Energy Privacy Program CRD and Privacy Act clauses are included in the prime contract.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>Perceptyx poses a moderate risk to privacy. Should HR data be compromised, it could cause personal and professional harm to individuals.</p> <p>Privacy risk is mitigated by a number of system features in contemplation of the Fair Information Practice Principles (FIPPs). The system maintains the minimum PII necessary for its business purpose to further data minimization. Use of the PII is limited to clearly defined business purposes. In addition, data in the system is protected by a series of administrative and technical controls, and the system implements privacy by design in the form of de-identifying filters; while unique identifiers are used to build data sets, information can only be filtered and viewed from the platform as aggregate data when a filter returns a minimum of 5 respondents for engagement surveys (BNL is currently using a higher minimum of 10) and a minimum of at least 3 respondents for targeted employee lifecycle surveys (i.e., onboarding, exit). Moreover, the records in the system are contractor-owned and DOE cannot retrieve PII in the system.</p>
<p>5. SORNs</p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>PII cannot be retrieved by an identifier. Information can only be filtered and viewed from the platform as aggregate data where there is a minimum of 5 respondents for engagement surveys (BNL is currently using a higher minimum of 10) and a minimum of at least 3 respondents for targeted employee lifecycle surveys (i.e., onboarding, exit).</p>
<p>6. SORNs</p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>A SORN is not required. PII is not retrievable and the information is contractor-owned and not subject to the Privacy Act. DOE does not own and cannot view or retrieve PII in the system.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Human Resources Information System (HRIS)</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>Surveys will derive new data from individuals' responses. While survey responses are linked to an individual, information can only be exported from the platform as aggregate data with a minimum of 5 respondents for engagement surveys (BNL is currently using a higher minimum of 10) and a minimum of at least 3 respondents for targeted employee lifecycle surveys (ie., onboarding, exit).</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Yes, a high-level architecture diagram is available from the FedRAMP System Security Package.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The PII will be used to send surveys to individuals and to generate demographic filters by which the data will be aggregated and reported. Comments are confidential and not associated with a particular person. Users are reminded not to put personal information when adding comment responses to questions. Aggregated (non-PII) data will be used to assess workplace culture and employee experience, identify opportunities, and measure progress.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>12. If the system derives meta data, how will the new or meta data be used?</p> <p>Will the new or meta data be part of an individual's record?</p>	<p>Any meta data will be used to build data sets and are only accessible to Perceptyx, not DOE. Information can only be filtered and viewed from the platform as aggregate (de-identified) data.</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>PII is not shared. Aggregated data may be shared with outside consultants.</p>
<p>REPORTS</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>None. Filtered reporting is limited to data sets that have a minimum number of respondents and has only de-identified data.</p>
<p>15. What will be the use of these reports?</p>	<p>Reports containing PII are not produced. Reports of aggregated responses reflect employee feedback on the workplace culture and employee experience and are used to identify opportunities and measure progress.</p>
<p>16. Who will have access to these reports?</p>	<p>Reports containing PII are not produced. The following users have access to reports containing de-identified data.</p> <p>Administrative users – limited users within the Director's Office and Human Resources with full-access to the Perceptyx platform.</p> <p>Limited-View - Human Resources - Human Resource Managers and Generalists - Will have access to data from the departments that they oversee.</p> <p>Limited-View - Management – Lab Directors, Associate Lab Directors, Division, Department Heads, Access to the single department/departments that they oversee.</p>
<p>MONITORING</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No, the system does not monitor individuals. Employment data provide limited location information.</p>



MODULE II – PII SYSTEMS & PROJECTS

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?	The system is not designed to enable the monitoring of individuals.
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.	<p>Individuals' data are imported from the existing HRIS. If an individual's information is corrected within that system, it would be corrected within Perceptyx the next time data are imported.</p> <p>Survey responses are directly provided by survey respondents.</p>
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 – The system is not operated at other sites.
RECORDS MANAGEMENT	
22. Identify the record(s).	MANAGEMENT IMPROVEMENT PROGRAM RECORDS ADM 16.1.2. (ADM 16 REV 5 AUGUST 2022)
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	<p>MANAGEMENT IMPROVEMENT PROGRAM RECORDS ADM 16.1.2: Management Improvement Programs. (N1-434-98-19(1.2)) Records generated as a part of a cultural philosophy which promulgates management improvement programs. The focus is on streamlining operations, providing cost effectiveness, improving customer satisfaction, and continuing improvement of work processes or products. Proactive preventive program records are included. Records may provide internal information, advice, or recommendations. Includes such files as employee suggestion forms, analyses, nonconformance process records, and related background material. Also includes corrective action plans in response to management improvement recommendations. Cut off at the end of each fiscal year. Destroy 5 years after cutoff</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>24. Records Contact</p>	<p>Patricia Garvey – Records Management Manager (631) 344-6062 pgarvey@bnl.gov</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	
<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Perceptyx is listed in the FedRAMP marketplace and is authorized at the MODERATE impact level. Technical controls including filters de-identify data for reports. Data can only be filtered and viewed in the aggregate from Perceptyx when the minimum number of respondents is met as previously indicated.</p>
<p>26. Who will have access to PII data?</p>	<p>An ITD administrator will have access to transfer PII data from the existing HRIS into Perceptyx. Those reviewing survey results will not be privy to the identities of the comment submitters. DOE does not have access to PII.</p>
<p>27. How is access to PII data determined?</p>	<p>No platform users will have access to PII. Data can only be filtered and viewed when the minimum number of respondents is met as previously indicated.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>Information is exported from the existing HRIS and imported into Perceptyx using Secure File Transfer Protocol (SFTP) using a manual process.</p>
<p>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?</p>	<p>There is no ISA because there is no automated information sharing. Information is manually entered into the system.</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>The ITD administrator is responsible for data import to the Perceptyx platform. No other users have access to PII.</p>

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
System Owner	_____	
	(Print Name)	
	_____	_____
	(Signature)	

	(Print Name)	
	_____	_____
	(Signature)	
Local Privacy Act Officer	_____	
	(Print Name)	
	_____	_____
	(Signature)	
Ken Hunt Chief Privacy Officer	_____	
	(Print Name)	
	_____	_____
	(Signature)	