



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: <u>https://www.directives.doe.gov/directives-documents/200-series/0206.1-BOrder/@@images/file</u>

Please complete form and return via email to Privacy@hq.doe.gov

No hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT		
Date	8/3/2022	
Departmental Element & Site	Office of Energy Efficiency and Renewable Energy (EERE) System is operated and managed from DOE Headquarters 1000 Independence Ave SW, Washington, DC 20585	
Name of Information System or IT Project	Project Management (PM) Bridge	
Exhibit Project UID	UID 019-000000142 - EE Corporate Management Systems	
New PIA X Update	This is a new PIA.	
	Name, Title	Contact Information Phone, Email
System Owner	Brandy Brooks, Business Process Management and Systems Team Lead	(202) 287-1868 Brandy.Brooks@ee.doe.gov





MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Shaida Beklik EERE HQ Cyber Security Program Manager	202-586-4769 Shaida.beklik@ee.doe.gov	
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Shaida Beklik EERE HQ Cyber Security Program Manager	202-586-4769 Shaida.beklik@ee.doe.gov	
Person Completing this Document	Brandy Brooks, Business Process Management and Systems Team Lead	(202) 287-1868 Brandy.Brooks@ee.doe.gov	
Purpose of	PM Bridge is an Office of Energy Efficiency and Renewable Energy (EERE) site that operates as a central location of project management information and data for DOE EERE staff and contractors. Internal DOE users must log directly into PM Bridge to view and enter data for lab		
Information System or IT Project	and financial assistance projects. The system resides on the HQ LAN and internal users will directly access the system at <u>www.pmbridge.ee.doe.gov</u> . Information on PM Bridge is not publicly available at this time.		
	SSN Social Security number		
	Medical & Health Information e.g. blood test	results	
Type of Information Collected or Maintained by the System:	Financial Information e.g. credit card number		
	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, Address [Business Contact Ir	nformation]	





MODULE I – PRIVACY NEEDS ASSESSMENT		
	Other – Please Specify	
	Organization Information (Name, Government and Phone Number)	Business POC, Address, e-mail,
Has there been any at system?	tempt to verify PII does not exist on the	No; PII is knowingly collected.
any information collected including but not limited to and criminal or employme distinguish or trace an ind Security number, date and	tment of Energy Privacy Program, defines PII as or maintained by the Department about an individual, o, education, financial transactions, medical history nt history, and information that can be used to ividual's identity, such as his/her name, Social d place of birth, mother's maiden name, biometric ther personal information that is linked or linkable to a	
If "Yes," what method contain PII? (e.g. syst	was used to verify the system did not em scan)	PII will be collected by the application and stored within the system.
Threshold Questic	ons	
	in (collect and/or maintain), or plan to ation about individuals?	YES
2. Is the information in	n identifiable form?	YES
3. Is the information a	bout individual Members of the Public?	YES
4. Is the information a	bout DOE or contractor employees?	YES ⊠ Federal Employees ⊠Contractor Employees

If the answer to <u>all</u> 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.





MODULE I – PRIVACY NEEDS ASSESSMENT

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		
1. AUTHORITY What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?	Department of Energy Authorization Act, Title 42, United States Code (U.S.C), Section 7101 et. seq. 2 Code of Federal Regulations (C.F.R.) 200, as amended by 2 C.F.R. Section 910	
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)?	 Non-DOE users (public individuals and organizations) provide information if they are receiving financial assistance from DOE or enter into contracts with DOE as a contractual requirement. Individuals can choose not to apply or decline to provide information (contact information). At this time, Non-DOE users do not provide information directly into PM Bridge. Rather their information (e.g., Business Contact and Principal Investigator name, email address, work address, telephone number) is pulled into PM bridge from other systems (e.g., PMC, Stripes, AOP tool) or via manual entry by EERE users. 	





MODULE II – PII SYSTEMS & PROJECTS		
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 are involved with the design, development and maintenance of the system; Privacy Act clauses are included in their contract.	
4. IMPACT ANALYSIS: How does this project or information system impact privacy?	 PM Bridge does not collect/maintain sensitive PII, like SSN or date of birth, which limits the privacy impact. If the system or data is breached, the impact to the individual's privacy would be low since the PII maintained in the system is business contact (possibly personal contact information in situations in which the Applicant is a sole proprietor) by users who wish to enter a financial relationship with DOE. PM Bridge is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls: Strict access control enforcement based on need-to-know While PM Bridge contains some PII, the ensuing risk to the privacy of individuals is generally low as the focus of PM Bridge is to operate as a central location of project management information and data for DOE EERE staff and contractors, which does not require or encourage collection of sensitive PII. 	
 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. 	Information collected from the PMC is only retrievable by project title, award number, and characteristics, such as the funding organization. PII is not retrievable by a name or a personal identifier.	





MODULE II – PII SYSTEMS & PROJECTS		
 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. 	N/A, PII is not retrievable by an identifier (e.g., name, unique number or symbol), see #5 above.	
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?	At this time, Non-DOE users do not provide information directly into the system. Rather their information (e.g., Business Contact and Principal Investigator name, email address, work address, telephone number) is entered into PM Bridge via manual entry by EERE users and/or pulled from EERE systems: - Strategic Integrated Procurement Enterprise System (STRIPES) - Annual Operating Plan tool (AOP)	
9. Will the information system derive new or meta data about an individual from the information collected?	No. The system will not derive new or meta data about an individual from the information collected.	
10. Are the data elements described in detail and documented?	Yes. Data elements are described in the PM Bridge database schema.	
DATA USE		
11. How will the PII be used?	PII is included in submission of project management reporting and will be used as part of the management of projects and to communicate updates to project recipients.	





MODULE II – PII SYSTEMS & PROJECTS		
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?	N/A. No meta-data is derived by the system.	
13. With what other agencies or entities will an individual's information be shared?	No information will be shared with other agencies, entities, or third- parties.	
Reports		
14. What kinds of reports are produced about individuals or contain an individual's data?	 Project-tracking and project-funding reports may include points of contact business contact information, which includes name, phone number, email address, and fax number. FOIA reports will contain a list of FOIA requests. The report will also include points of contact information, which includes name, phone number, email address, and fax number. Listings of projects assigned to contracting officers and project managers will contain business contact information for those individuals. 	
15. What will be the use of these reports?	The reports will be used to facilitate effective project and program management, and to ensure responsiveness to FOIA requests.	
16. Who will have access to these reports?	The reports will be available to those individuals who have an assigned role as participants or managers of the projects or who have an oversight or program management role that covers the information being reported.	
Monitoring		
17. Will this information system provide the capability to identify, locate, and monitor individuals?	No. The system does not have the capability to identify, locate, and monitor individuals.	
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A. No information is collected as a function of monitoring individuals.	





MODULE II – PII SYSTEMS & PROJECTS		
19. Are controls implemented to prevent unauthorized monitoring of individuals?	Yes. Although the site/system does not have monitoring capability, EERE has implemented security controls to prevent unauthorized users from monitoring or accessing any of the PII on the system (e.g., Access Controls).	
DATA MANAGEMENT & MAINTE	NANCE	
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.	Information is provided and updated directly from the individuals via their reported project management reports.	
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	PM Bridge is only operated at one site, DOE Headquarters at 1000 Independence Ave SW, Washington, DC 20585.	
Records Management		
	The system includes:	
	 Project award and management information, which falls under NARA's GRS 1.2 – Grant and Cooperative Agreement Records, items 010, 020, and 030; 	
22. Identify the record(s).	 Project management information and data for DOE EERE staff and contractors, which falls under DOE 1.2 - Cooperative Research and Development Agreement (CRADA) Licensing and Collaborative Agreement and Cost-Sharing Agreements, item 070 	
	 FOIA requests, which fall under GRS 4.2 – Access and Disclosure Request files, item 020. 	





MODULE II – PII SYSTEMS & PROJECTS	
	Check appropriately and cite as required.
	□ Unscheduled X Scheduled (<i>cite NARA authority(ies) below</i>)
	 Project Award and Management Information Grant and Cooperative Agreement Program Management Records GRS 1.2, item 010 (DAA-GRS-2013-0008-0007) Temporary. Destroy 3 years after final action is taken on the file.
	 Grant Cooperative Agreement Case Files GRS 1.2, item 020 (DAA-GRS-2013-0008-001) Temporary. Destroy 10 years after final action is taken on file.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	 Cooperative Research and Development Agreement (CRADA) Licensing and Collaborative Agreement and Cost-Sharing Agreements DOE 1.2, item 070 (DAA-0434-2020-0007-0007) Permanent. Cut off at termination of agreement. Offer to NARA 25 years after cutoff.
	 Final Grant and Cooperative Agreement Products or Deliverables GRS 1.2, item 030 (DAA-GRS-2013-0008-0003) Temporary. DOE Business Use: Destroy when 1 year old.
	FOIA Requests Access and Disclosure Request Files GRS 4.2, item 020 (DAA-GRS-2016-0002-0001) Temporary. Destroy 6 years after final agency action or 3 years after final adjudication by the courts, whichever is later.
24. Records Contact	Tia Alexander Tia.Alexander@ee.doe.gov 202-586-3135
ACCESS, SAFEGUARDS & SECURITY	





MODULE II – PII SYSTEMS & PROJECTS		
25. What controls are in place to protect the data from unauthorized access, modification or use?	System access is (granted) based on role and upon approval. The System Owner implemented required baseline security controls as appropriate to its FIPS categorization to prevent unauthorized access, modification, and use, in accordance with DOE Directives and the Office of the Under Secretary of Energy Implementation Plan for the Department's Risk Management Approach (Energy Programs RMA IP). In addition, security assessments are conducted on an annual basis using the NIST SP 800-53 methodology. These assessments involve the evaluation of risk, including the likelihood and magnitude of harm, from the unauthorized access, use, disclosure, disruption, modification, or destruction of the information system and the information it processes, stores, or transmits.	
26. Who will have access to PII data?	Based on PM Bridge's system's permissions model and access level, designated DOE internal users and System Administrators will have access to all or part of PII data to perform their duties.	
27. How is access to PII data determined?	Contact and PII data is made available only to users who are authorized to see information about specific projects. For example, DOE project managers can see awardee information about those projects for which they are responsible, but not about projects managed by others. The system implements role-based access controls.	
28. Do other information systems share data or have access to the data in the system? If yes, explain.	 PM Bridge shares data with the following EERE applications: STRIPES – PM Bridge will pull STRIPES financial assistance project data (e.g., Project Title, Project description, CID, Organization name, Organization address, Award date and status, funding amount of award, Business Contact, Principal Investigator) AOP Tool- PM Bridge will pull AOP lab project data (i.e, Project name, project description, Lab name, project dates and status, Business Contact, Principal Investigator, project cost) PMC – PM Bridge will pull the principal place of performance from the PMC for financial assistance projects. EERE Data Center (EDC): This is a one-way data transfer of available PM Bridge data on a periodic basis for reporting purposes into EDC. 	
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?	EDC, STRIPES, PMC, and the AOP tool are internal DOE EERE systems. Therefore, these interconnections do not require an ISA.	





MODULE II – PII SYSTEMS & PROJECTS

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

PM Bridge System Owner

END OF MODULE II





SIGNATURE PAGE		
	Signature	Date
System Owner	(Print Name)	
	(Signature)	_
Local Privacy Act Officer	(Print Name)	
	(Signature)	_
<i>Ken Hunt</i> Chief Privacy Officer	(Print Name)	
	(Signature)	

