



PRIVACY IMPACT ASSESSMENT: ESHQ – OITS  
PIA Template Version 5 – August 2017

Affects   
Members  
Of the Public?

Department of Energy

Privacy Impact Assessment (PIA)



**MODULE I – PRIVACY NEEDS ASSESSMENT**

<b>Date</b>	11/9/2021	
<b>Departmental Element &amp; Site</b>	West Valley Demonstration Project, CH2M HILL BWXT West Valley, LLC (CHBWV) – 10282 Rock Springs Rd, West Valley NY 14171	
<b>Name of Information System or IT Project</b>	Open Items Information Tracking System (OITS)	
<b>Exhibit Project UID</b>	019-60-02-00-01-5013-00	
<b>New PIA</b> <input checked="" type="checkbox"/>	Open Items Information Tracking System (OITS) .	
<b>Update</b> <input type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	Paul Contreras	716-942-4450 Paul.Contreras@chbwv.com



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Local Privacy Act Officer</b>	Michelle Farris Office of Legal Services EMCBC, U.S. Department of Energy	Phone (513) 246-0584 Fax (513) 246-0524 michelle.farris@emcbc.doe.gov
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Corey Chun (ISSM) Business Manager & CFO	716-942-4515 Corey.chun@chbwv.com
<b>Person Completing this Document</b>	Lawrence Myszka	716-942-4727 Larry.myszka@chbwv.com
<b>Purpose of Information System or IT Project</b>	Application used to track open action items/commitments at CHBWV. This system is used to organize tasks for completion. The system contains limited PII including names and task information necessary for this business purpose.	
<b>Type of Information Collected or Maintained by the System:</b>	<input type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify – status of open items and issues. May include information about a sub-contractor. Can contain negative comments.	



## MODULE I – PRIVACY NEEDS ASSESSMENT

<p><b>Has there been any attempt to verify PII does not exist on the system?</b></p> <p><i>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.</i></p>	<p>PII exists</p>
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<p><b>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</b></p>	
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### Threshold Questions

<p><b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b></p>	<p>YES</p>
<p><b>2. Is the information in identifiable form?</b></p>	<p>NO</p>
<p><b>3. Is the information about individual Members of the Public?</b></p>	<p>NO</p>
<p><b>4. Is the information about DOE or contractor employees?</b></p>	<p>YES or NO (If Yes, select with an "X" in the boxes below)</p> <p><input type="checkbox"/> Federal Employees</p> <p><input checked="" type="checkbox"/> Contractor Employees</p>

**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.



## **MODULE I – PRIVACY NEEDS ASSESSMENT**

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

<p><b>1. AUTHORITY</b></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 7101</p>
<p><b>2. CONSENT</b></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>Information provided is a condition of employment. All employees are required to read and sign the Rules of Behavior in which they consent to ...”no expectation of privacy on any information entered, stored, or transferred through CHBWV computers, host systems or networks.”</p>
<p><b>3. CONTRACTS</b></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>NO</p>
<p><b>4. IMPACT ANALYSIS:</b></p> <p>How does this project or information system impact privacy?</p>	<p>The system poses a low privacy risk in light of the low sensitivity of the PII. A number of controls are implemented to mitigate privacy risk in contemplation of the FIPPs.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>5. SORNs</b></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>OITs items can be searched by individual's name</p>
<p><b>6. SORNs</b></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>DOE-2, 74 FR 999 DOE-3, 74 FR 1000 DOE-5, 74 FR 1003</p>
<p><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</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>The PII in this system includes individual name and manager. The OITS administrator(s) accesses a database maintained by the company to select the individual responsible to complete the action. Occasionally, information on an individual involved/associated with an Action may be contained in the system. Examples include the individual who may have identified an issue, contact person for additional information, completed work products used to document closure of an Action, etc.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>NO.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>Yes</p>
<p><b>DATA USE</b></p>	
<p><b>11. How will the PII be used?</b></p>	<p>Reports are issued to identify and organize open action items and commitments for completion.</p>
<p><b>12. If the system derives meta data, how will the new or meta data be used?</b>   <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>Standard reports are issued weekly for actions coming due within the week and coming due within 30-days. Ad-hoc reports may be generated to specific to piece of correspondence or assessment report, the ad-hoc reports contain the same data field as the standard reports.</p> <p>Additionally, information may be shared during the course of assessment or audit conducted internally, with a corporate partner and/or other entity authorized by DOE.</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>Reports are issued that identify the Actions. PII contained in the reports are the name of the individual responsible to complete the action, the individuals manager, and the person who originated the action/issue.</p> <p>Additionally, a specified assessment report may be produced /printed. The assessment report would contain the names and titles of the assessors and may contain the names and titles of the individuals contacted during the assessment.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>Generated reports issued to document status of Actions closed and/or remaining open..</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>16. Who will have access to these reports?</b></p>	<p>WVDP Managers and Supervisors, auditors (internal and external), and other person's interested the status of Actions generated from corrective action plans, ORPS reports, and other activities.</p>
<p><b>MONITORING</b></p>	
<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>No, the data is not used to identify, locate, or monitor individuals..</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>Access to the database tables/data is restricted to those individuals that have a need to utilize the data for job functions. User authentication is utilized for access to the application.</p> <p>Furthermore, the server housing the data and client workstations are also part of the CHBWV GSS. All security controls for the CHBWV GSS also apply.</p> <p>Access to all information systems (i.e. servers and workstations) which are part of the CHBWV are logged and monitored via a combination of the TripWire product (baseline monitoring) and SolarWinds (log monitoring).</p> <p>Finally the CHBWV GSS has undergone a Mission Information Protections Plan (MIPP) review on an annual basis and has obtained an Authorization to Operate at CHBWV until December 21<sup>st</sup>, 2023.</p>
<p><b>DATA MANAGEMENT &amp; MAINTENANCE</b></p>	
<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>PII information is maintained and updated by Human Resources.</p>





## MODULE II – PII SYSTEMS & PROJECTS

<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>The system is operated within only the CHBWV GSS accreditation boundary.</p>
<p><b>RECORDS MANAGEMENT</b></p>	
<p><b>22. Identify the record(s).</b></p>	<p>Commitment Item J2, form WV-1082 and attached documentation.</p>
<p><b>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b></p>	<p><input type="checkbox"/> <input checked="" type="checkbox"/> Scheduled (<i>cite NARA authority(ies) below</i>) ADM  22.2.B.1</p>
<p><b>24. Records Contact</b></p>	<p>Lori Kearney  716-942-4074  Lori.Kearney@chbwv.com</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>CHBWV has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the Senior DOE Management RMAIP and DOE Directives.</p> <p>Access to the database table/data is restricted to those individuals that have a need to utilize the data for job functions. User credentials are utilized to authenticate to the database. Managers are only given a 1-2 week window to access system to input their recommendations.</p> <p>Access to information systems (servers and workstations) which are part of the CHBWV GSS are logged and monitored through SolarWinds Log and Event Manager.</p> <p>The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the Senior DOE Management PCSP and DOE Directives. CHBWV GSS has undergone a Mission Information Protections Plan (MIPP) review on an annual basis and has obtained an Authorization to Operate until December 21<sup>st</sup>, 2023. The MIPP audit found CHBWV to have mitigated risk to an acceptable level.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>26. Who will have access to PII data?</b></p>	<p>Persons authorized to access the database will have ability to access the data. Personnel access authorization involves the person’s manager, database owner, and ISSM (Form 1626).</p>
<p><b>27. How is access to PII data determined?</b></p>	<p>Access is determined through Account Access procedure (CP-115) and is limited/restricted to data needed by individual. Access is controlled both at the application level and network authentication level. Management, Data Owner, and ISSM must approve all requests</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>
<p><b>30. Who is responsible for ensuring the authorized use of personal information?</b></p>	<p>The CHBWV Information System Security Manager (ISSM) and the Quality Assurance Manager. All the access controls listed in CP-115 (account access procedure) have been implemented. This includes the following access controls: AC-1, AC-2, AC-3, AC-5, AC-6, and AC-17.</p> <p>These controls were defined in RMAIP-February2014_EXEC-2013-008183_4. The versions of the controls are provided in Appendix A in RMAIP-February2014_EXEC-2013-008183_4.</p>

**END OF MODULE II**



## SIGNATURE PAGE

	Signature
<b>System Owner</b>	<p><u>Paul Contreras</u> (Print Name)</p> <p><u>Paul H Contreras</u> (Signature)</p>
<b>Local Privacy Act Officer</b>	<p><u>Michelle Farris</u> (Print Name)</p> <p><u>Michelle Farris</u> (Signature)</p>
<b>Ken Hunt Chief Privacy Officer</b>	<p><u></u> (Print Name)</p> <p><u></u> (Signature)</p>