



Affects Members Of the Public?	<input checked="" type="checkbox"/>
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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: <https://www.directives.doe.gov/directives-documents/200-series/0206.1-BOrder/@@images/file>

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>	July 13, 2022	
<b>Departmental Element &amp; Site</b>	Office of General Counsel (GC) System is hosted at DOE’s Forrestal Facility (EERE HQ LAN facility)	
<b>Name of Information System or IT Project</b>	GC32 Case Manager Pro (CMP)	
<b>Exhibit Project UID</b>	019-000000139	
<b>New PIA Update</b>	<input type="checkbox"/> <input checked="" type="checkbox"/>	
	This is an update to the GC32 CMP PIA, which was last approved in January 2015. This update includes Product and Regulation information.	
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	David Case GC32-CMP System Owner	(202) 287-6998 <a href="mailto:David.Case@Hq.Doe.Gov">mailto: David.Case@Hq.Doe.Gov</a>



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Local Privacy Act Officer</b>	Shaida Beklik Privacy Act Officer	202-586-4769 <a href="mailto:Shaida.beklik@ee.doe.gov">Shaida.beklik@ee.doe.gov</a>
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Shaida Beklik EERE HQ Cyber Security Program Manager	202-586-4769 <a href="mailto:Shaida.beklik@ee.doe.gov">Shaida.beklik@ee.doe.gov</a>
<b>Person Completing this Document</b>	Rowena Clemente Cyber Security Manager, Accenture Federal Services (AFS)	<a href="mailto:rowena.clemente@ee.doe.gov">rowena.clemente@ee.doe.gov</a>
<b>Purpose of Information System or IT Project</b>	<p>The Department of Energy (DOE) Office of the Assistant General Counsel for Enforcement (GC32) is responsible for ensuring manufacturers deliver covered products and covered equipment (10 CFR §§ 430.2, 431.2) that are in compliance with energy-efficiency standards and other regulations through prosecution of violations, issuance of guidance, and extensive outreach. There are about 60 different types of covered products and covered equipment. They range from faucets and showerheads to clothes washers and refrigerators to electric motors and distribution transformers used by power companies. GC32 enforces regulations to be sure that the products they deliver to American consumers are compliant.</p> <p>The GC32 Case Manager Pro (GC32 CMP) System is used to track open cases for GC32 and serves as a repository for all case documents. The system includes case information (e.g., case number, company name, types of violations, types of products, status), contact information (e.g., contact type, contact name, phone, email, address), workflow information (e.g., dates documents sent, dates documents due), and document information (e.g., document type, document description and the actual document). Only the DOE employees assigned to the Office of the Assistant General Counsel for Enforcement, the GC32 CMP System Administrator, and the System Owner have access to the system (currently seven total users).</p> <p>Case Manager Pro is a commercial off-the-shelf (COTS) web based legal case management system by Lucid IQ. The frontend user interface leverages Javascript, Dynamic HyperText Markup Language (DHTML), and Asynchronous JavaScript and Extensible Markup Language (AJAX) web technologies while the backend uses a Microsoft Structured Query Language (SQL) Server instance.</p>	



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Type of Information Collected or Maintained by the System:</b>	<input type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <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 type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify (Business contact info: name, business phone number, business email, mailing address)
<b>Has there been any attempt to verify PII does not exist on the system?</b>  DOE Order 206.1, <i>Department of Energy Privacy Program</i> , 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.	NO
<b>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</b>	N/A
<b>Threshold Questions</b>	
<b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b>	YES
<b>2. Is the information in identifiable form?</b>	YES
<b>3. Is the information about individual Members of the Public?</b>	YES



## MODULE I – PRIVACY NEEDS ASSESSMENT

4. Is the information about DOE or contractor employees?

YES

Federal Employees

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



## MODULE II – PII SYSTEMS & PROJECTS

<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>The legal authorities to gather and use the information are outlined in:</p> <ul style="list-style-type: none"> <li>• 42 U.S.C. 7101 Sec. 102 (5)(D) (Department of Energy Organization Act)</li> <li>• 44 USC 3501 (Paperwork Reduction Act of 1980)</li> <li>• 31 U.S.C. 7701(c) (Debt Collection Improvement Act (DCIA))</li> <li>• 42 U.S.C. 6303 (Energy Policy and Conservation Act)</li> </ul>
<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>The system's information is based on legal documents and filings and publicly available information from company websites. The companies are the companies we are investigating. It could be any manufacturer or importer of any covered product or covered equipment. The parties to the case may submit additional information and business/legal contacts as needed to assist in the development of the case. Parties cannot decline to provide their information if there is a case against them.</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.</p>
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>The system contains personally identifiable business contact information such as names, phone numbers, email addresses, and addresses of individuals.</p> <p>CMP is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:</p> <ul style="list-style-type: none"> <li>• Strict access control enforcement based on need-to-know</li> </ul> <p>The system also contains corporate financial data, but this information is not retrievable by any search method and is not tied to records for individuals. As a result, while the system contains PII, the potential for privacy concerns if the system was compromised is low.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<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>GC32 CMP data can be retrieved through a unique identifier such as name of the individual.</p> <p>PII can be retrieved from the system using the following identifiers:</p> <ul style="list-style-type: none"> <li>• First and/or last name</li> <li>• Business/Personal Contact information</li> <li>• Company name</li> <li>• Case Number</li> <li>• Attorney for a company or employee of a company</li> </ul>
<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>Yes, the records in the system are covered by existing DOE-SORN 41 – <i>Legal Files</i>.</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>No</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>Subject businesses, legal entities, and individuals; inspection reports, other agencies, Office of General Counsel, other agency officers and staff, investigators, and auditors. Defendants may provide certain financial information either directly or from subpoena to outside vendors (Ebay, Paypal 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, data elements are described in detail and documented in the database schema Entity Relationship Diagram (ERD).The ERD is generated by and stored in the SQL server database.</p>
<p><b>DATA USE</b></p>	
<p>How will the PII be used?</p>	<p>PII is used by GC32 CMP to provide the proper business and legal contacts for companies and individuals involved in cases.</p>
<p><b>11. If the system derives meta data, how will the new or meta data be used?</b></p> <p>Will the new or meta data be part of an individual's record?</p>	<p>N/A</p>
<p><b>12. With what other agencies or entities will an individual's information be shared?</b></p>	<p>GC32 CMP does not share information with any other agency or entity.</p>
<p><b>Reports</b></p>	
<p><b>13. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>GC32 CMP does not produce reports pertaining to individuals.</p>
<p><b>14. What will be the use of these reports?</b></p>	<p>N/A</p>
<p><b>15. Who will have access to these reports?</b></p>	<p>N/A</p>
<p><b>Monitoring</b></p>	
<p><b>16. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>No</p>
<p><b>17. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	<p>N/A</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>18. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>DATA MANAGEMENT &amp; MAINTENANCE</b></p>	
<p><b>19. 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>For this system, DOE uses PII to keep business contact info related to the legal cases. As cases progress contact info may change, the attorney handling the case will update the information to reflect the most recent and relevant contact info.</p>
<p><b>20. 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 – The system is operated at only one site (DOE – Forrestal Headquarters building, Washington DC).</p>
<p><b>Records Management</b></p>	
<p><b>21. Identify the record(s).</b></p>	<p>Case contact information related to violations of the Department of Energy’s energy-efficiency standards regulations.</p>
<p><b>22. 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.  <input checked="" type="checkbox"/> <b>Unscheduled</b>    <input type="checkbox"/> <b>Scheduled</b> <i>(cite NARA authority(ies) below)</i></p>
<p><b>23. Records Contact</b></p>	<p>Jennifer Mykijewycz,  <a href="mailto:jennifer.mykijewycz@hq.doe.gov">jennifer.mykijewycz@hq.doe.gov</a>;          (240) 449-9214</p>
<p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>	
<p><b>24. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>GC32 CMP has controls in place to prevent unauthorized access, modification, and use. For a detailed description of logical access controls in place, please reference the GC32 CMP System Security Plan (SSP).</p>





## MODULE II – PII SYSTEMS & PROJECTS

<b>25. Who will have access to PII data?</b>	GC32 CMP system administrators and individuals assigned to access and/or manage the system will have access to PII.
<b>26. How is access to PII data determined?</b>	Only DOE attorneys/paralegal and system administrators have access to the business contact information in the system.
<b>27. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	No
<b>28. 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>	N/A
<b>29. Who is responsible for ensuring the authorized use of personal information?</b>	System Owner

**END OF MODULE II**



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