



PRIVACY IMPACT ASSESSMENT: **ORG NAME – SYSTEM NAME**
 PIA Template Version 5 – August 2017

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

No hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	6/10/2021	
Departmental Element & Site	Office of Legacy Management, Morgantown, WV	
Name of Information System or IT Project	Correspondence Tracking and Management System (LM)	
Exhibit Project UID		
New PIA <input checked="" type="checkbox"/>	This is a new PIA submission.	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Edwin T. "Doc" Parks Team Lead, Archives and Information Management	Office: (304) 413- 0823 Edwin.Parks@lm.doe.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Edwin T. “Doc” Parks Team Lead, Archives and Information Management (AIM)	Office: (304) 413- 0823 Edwin.Parks@lm.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Bob Walker IT Specialist, AIM	304-413-0825 Bob.Walker@lm.doe.gov
Person Completing this Document	Giancarlo Deguia AIM	304-413-0809 Giancarlo.Deguia@lm.doe.gov
Purpose of Information System or IT Project	<p>The Correspondence Tracking and Management System (LM) provides for tracking, coordination, approval and signature of various correspondence assigned to or originating from the Office of Legacy Management. Once *correspondence case files are completed, they are captured and preserved in LM’s Electronic Content Management (ECM) system as a federal record until dispositioned according to a NARA-approved records schedule. Various correspondence inquiries, such as verification of technical or administrative data, business operations information, or any gathering of information requiring review and concurrence, internal memorandums, etc. will include but are not limited to internal requests to/from LM and DOE, federal, state, and local government agencies, tribal nations, congressional inquiries, constituents, and other stakeholder interests.</p> <p>A case file is a series of documents that support a correspondence request or concurrence. Each case file consists of the following:</p> <ol style="list-style-type: none"> 1. Submission Request Form-5W’s pertaining to a correspondence request. 2. Draft correspondence file-Correspondence in draft form to allow for modification, revision, and review. 3. References-Any supporting documents. 4. Record of Concurrence- Official LM form capturing concurrence equities. 	
Type of Information Collected or	<input type="checkbox"/> SSN Social Security number	



MODULE I – PRIVACY NEEDS ASSESSMENT

Maintained by the System:	<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. fingerprint, retinal scan <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify: Work title, work site/location, and in cases of a response to a citizen/constituent, their contact information by virtue of reference material as applicable/appropriate.
Has there been any attempt to verify PII does not exist on the system? 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.	Yes.
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	At most, contact information representative of each correspondence request and inquiry will be captured in the system.
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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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

Yes. In cases where there may be a response in reference to a member of the public making an inquiry, the reference material could contain personal information to the extent of contact information, i.e., phone number, address.

4. Is the information about DOE or contractor employees?

- 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>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>As provided in DOE O 471.7, “Establish the Department of Energy’s (DOE) Controlled Unclassified Information (CUI) Program and document a policy for designating and handling information that qualifies as CUI. The CUI Program standardizes the way DOE handles information that requires protection under laws, regulations, or Government-wide policies (LRGWP), but that does not qualify as classified under Executive Order (EO)13526, Classified National Security Information, 12-29-2009 (3 Code of Federal Regulations (CFR), 2010 Comp., p. 298-327), or any predecessor or successor order, or the Atomic Energy Act of 1954 (42 U.S.C. 2011, et seq.), as amended. This Directive implements the requirements in EO 13556, Controlled Unclassified Information, and 32CFR part 2002, Controlled Unclassified Information.”</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>The only public privacy information that will be in the system is the information contained in the incoming correspondence. It is routine for the Office of Legacy Management to receive requests for information from their stakeholders, which includes members of the public. These requests are received through their congressional representative which is reviewed and handled through the Office of Congressional Affairs. Any congressional inquiries received will come through HQ eDocs and ingested into LM’s correspondence system for accountability and to capture requests being fulfilled. Once final approval authority is received, HQ personnel will then upload all relevant documents back to eDocs for further approval, routing, and transmission.</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. The Privacy Order CRD and the Privacy Act clauses are included in their contract.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>DOE has assessed Correspondence Tracking and Management System (LM) as a low risk system for confidentiality, integrity, and availability according to the criteria set forth in Federal Information Processing Standard (FIPS) 199 established by the National Institute of Standards and Technology (NIST). The risk rating is used to determine the effect to the agency should the system's confidentiality, integrity or availability be compromised.</p> <p>The Correspondence Tracking and Management System (LM) may impact an individual's privacy to the extent that: 1-For a DOE employee or contractor, the role/title, work location and/or contact phone number and email will be disclosed directly, or via systems (Active Directory, People Checker, etc.). 2-In case of the public at large, in response to an inquiry by a citizen/constituent, reference material could contain personal information such as personal address and phone number and/or email.</p> <p>Correspondence Tracking and Management System (LM) is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:</p> <ul style="list-style-type: none"> • Strict access control enforcement based on need-to-know • Security Controls <p>While the Correspondence Tracking and Management System (LM) contains some PII, the ensuing risk to the privacy of individuals is generally low as the focus of the Correspondence Tracking and Management System (LM) is to provide for tracking, coordination, approval and signature of various correspondence assigned to or originating from the Office of Legacy Management. This does not require or encourage collection of sensitive PII and is not driven by analysis of PII.</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>The system will use a unique case file number to look up correspondence, as well as metadata such as subject, date, action officer (federal employee). The unique case file number is not linked to PII.</p>



MODULE II – PII SYSTEMS & PROJECTS

<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>No.</p>
<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>Individual-provided, Federal or State agency, named third party.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Yes. A metadata form (both in the system and affiliated procedural document) exists and delineates what data elements are being sought, in which the system will function in processing the correspondence action.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The PII will be used to respond to the requestor and their request.</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>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>In the event that LM receives correspondence requiring external input from other agencies (federal, state, local, tribal), LM will forward to the appropriate agency to provide a comprehensive answer to an inquiry. In those cases, names and contact information of the requestor will also be forwarded.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>N/A</p>
<p>15. What will be the use of these reports?</p>	<p>N/A</p>
<p>16. Who will have access to these reports?</p>	<p>N/A</p>
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No.</p>
<p>18. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>N/A.</p>
<p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>N/A.</p>

DATA MANAGEMENT & MAINTENANCE



MODULE II – PII SYSTEMS & PROJECTS

<p>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>	<p>The system will only contain PII provided by an individual as part of the incoming correspondence and will only be used in responding to the requestor.</p>
<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?</p>	<p>The use of the system is codified in an Office of Legacy Management Procedure, which is a controlled document.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>DAA-GRS2016-0015- 0012/ item 100 DAA-GRS2017-0010- 0002/ item 020 DAA-GRS2016-0011- 0001/item 010 DAA-GRS2017-0008- 0001/item 010 DAA-GRS2017-0008- 0002/item 020 DAA-GRS2017-0008- 0006/item 060 DAA-GRS2015-0001- 0005/item 050 DAA-GRS2016-0005- 0002/item 020</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>Check appropriately and cite as required.</p> <p><input type="checkbox"/> Unscheduled <input checked="" type="checkbox"/> Scheduled (<i>cite NARA authority(ies) below</i>)</p> <p>DAA-GRS2016-0015- 0012/ item 100</p> <p>DAA-GRS2017-0010- 0002/ item 020</p> <p>DAA-GRS2016-0011- 0001/item 010</p> <p>DAA-GRS2017-0008- 0001/item 010</p> <p>DAA-GRS2017-0008- 0002/item 020</p> <p>DAA-GRS2017-0008- 0006/item 060</p> <p>DAA-GRS2015-0001- 0005/item 050</p> <p>DAA-GRS2016-0005- 0002/item 020</p>
<p>24. Records Contact</p>	<p>Giancarlo Deguia Giancarlo.deguia@lm.doe.gov (304) 413-0809</p>

ACCESS, SAFEGUARDS & SECURITY

<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Please refer to your organization’s implementation of DOE Cyber Security Directives and Senior DOE Management Program Cyber Security Plans (PCSP). For example: "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. The system was certified and accredited (provide date(s)) and found to have mitigated risk to an acceptable level."</p> <p>SharePoint is controlled by Access Control Lists managed by Active Directory. Access is limited to those that have a need to know.</p>
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<p>26. Who will have access to PII data?</p>	<p>LM Field Office Administrator</p> <p>LM Correspondence Subject Matter Experts</p> <p>LM Correspondence Intermediaries (Action Officer, Concurrence Equities, and Signature Authority).</p> <p>LM Management</p>
<p>27. How is access to PII data determined?</p>	<p>Use roles determine permissions (as aforementioned in 26).</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>Many information systems interconnect and share data. Please identify all systems that connect to and access information on this system.</p> <p>There is no known link, though as mentioned the data could be made available given the shared nature of this environment.</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>N/A.</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>The System Owner will decide the rules by which users can be granted various levels of access.</p>

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
<p>System Owner</p>	<p><u>Edwin “Doc” Parks</u> (Print Name)</p>	



PRIVACY IMPACT ASSESSMENT: **ORG NAME – SYSTEM NAME**
PIA Template Version 5 – August 2017

	<hr/> <p>(Signature)</p>	<hr/>
Local Privacy Act Officer	Edwin “Doc” Parks <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Ken Hunt Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>