

Privacy Impact Assessment Questionnaire

Department of Energy
Privacy Impact Assessment (PIA)

Affects Members Of the Public?	

Guidance is provided in the template. See <u>DOE Order 206.1</u>, <u>Department of Energy Privacy</u>

<u>Program</u>, <u>Appendix A</u>, Privacy Impact Assessments, for requirements and additional guidance for conducting a PIA.

Please complete electronically: no hand-written submissions will be accepted.

This template may not be modified.

Module I – Privacy Needs Assessment			
Date	05/12/2021		
Departmental Element & Site	Sustainability Performance Division, MA-53 AWS US East/West as managed by DOE EITS DC&SS		
Name of Information System or IT Project	Sustainability Dashboard (Dashboard)		
Exhibit Project UID			
New PIA Update	Update PIA for POCs and system location	date PIA for POCs and system location.	
	Name, Title	Contact Information Phone, Email	
System Owner	Isabelle Heilman Isabelle Heilman Ov		



Module I – Privacy Needs Assessment			
Local Privacy Act Officer	N/A	N/A	
Cybersecurity Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Ilir Angjeli Security Officer	202-586-3282 Ilir.Angjeli@hq.doe.gov	
Person Completing this Document	Soudeh Motamedi	503-898-0266 Soudeh.Motamedi@hq.do e.gov	
Purpose of Information System or IT Project	The Dashboard serves several functions for DOE sustainability data reporting. The Dashboard serves several functions for DOE sustainability reporting and performance tracking. The Dashboard maintains historical data and plan narratives for each DOE site and national laboratory and collects current year information. In addition, the Dashboard features analytics to provide DOE sustainability personnel with tools for managing sustainability at their site or within their program. Since the FY 2016 reporting cycle, the Dashboard has been the sole official method of sustainability data reporting. Users are able to upload PDF, MS Word, MS PPT and MS Excel documents to supplement their data.		
Type of Information Collected or Maintained by the System:	SSN Social Security number Medical & Health Information e.g. blood test results 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 Other		



Module I – Privacy Needs Assessment		
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.	No	
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	N/A	
Threshold Questions		
Does system contain (collect and/or maintain), or plan to contain any information about individuals?	Yes	
2. Is the information in identifiable form?	Yes	
3. Is the information about individual Members of the Public?	No	
4. Is the information about 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.

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		
1. AUTHORITY What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?	44 U.S.C. 3501 (Paperwork Reduction Act of 1980) 44 U.S.C. 101 (The E-Government Act of 2002) In addition, the business purpose for the collection of personal information is authorized by the Department of Energy Organization Act, Title I, Declaration of Findings and Purposes, section 102.	
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)?	In order to create a Dashboard account, the user is required to provide their name, their work address, their work email, and their work telephone number.	
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.	



	Module II – PII Systems & Projects		
4.	IMPACT ANALYSIS: How does this project or information system impact privacy?	There is no impact to privacy. Only the user's name, work address, work email, and work telephone number are captured by the system. The information is collected and used only as supplemental metadata on the user's profile. Additionally, the user information can only be accessed by application administrators.	
5.	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.	No. The system does not contain any searching capabilities that would allow a user to retrieve data based on PII.	
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.	No.	
7.	SORNs If the information system is being modified, will the SORN(s) require amendment or revision?	N/A	
Dat	Data Sources		
8.	What are the sources of information about individuals in the information system or project?	The user information is entered directly by the end user.	



Module II – PII Systems & Projects			
9. Will the information system derive new or meta data about an individual from the information collected?	No. The user's name, work address, work email, and work telephone number are used only as supplemental information on the user's profile.		
10. Are the data elements described in detail and documented?	The data elements are appropriately described/labeled on the account creation web form.		
Data Use			
11. How will the PII be used?	The information is only used as supplemental data in the user's profile.		
12. If the system derives meta data, how will the new or meta data be used?	N/A		
Will the new or meta data be part of an individual's record?			
13. With what other agencies or entities will an individual's information be shared?	The information is internal to the Department of Energy and will not be shared outside of the Department.		
Reports			
14. What kinds of reports are produced about individuals or contain an individual's data?	No reports are generated that contain PII.		
15. What will be the use of these reports?	N/A		
16. Who will have access to these reports?	N/A		
Monitoring			
17. Will this information system provide the capability to identify, locate, and monitor individuals?	No.		



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?	No.		
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.	The user information captured by the system is entered directly by the end user. Prior to account approval, the user information is reviewed by the application administrators to ensure completeness.		
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		
Retention & Disposition			
22. What are the retention periods of data in the information system?	User profiles are retained for the life of the system.		
23. What are the procedures for disposition of the data at the end of the retention period?	User profiles are retained for the life of the system.		
Access, Safeguards & Security			
24. What controls are in place to protect the data from unauthorized access, modification or use?	The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with DOE Directives and the DOE Energy IT Services Program Cyber Security Plan (PCSP). Additionally, the PII information in question can only be accessed by application administrators.		



Module II – PII Systems & Projects		
25. Who will have access to PII data?	Aside from the user, application administrators are the only members of the user community that can access all the PII data.	
26. How is access to PII data determined?	A user account's permission set determines what a user can see and do within the system. A request for an administrative account must be approved by the System Owner.	
27. Do other information systems share data or have access to the data in the system? If yes, explain.	No.	
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?	N/A	
29. Who is responsible for ensuring the authorized use of personal information?	An application administrator, and in some cases the System Owner, is responsible for the approval of new user accounts and determining their level of access. The application administrators are responsible for implementing the changes and monitoring system activity.	
END OF MODULE II		



SIGNATURE PAGE			
System Owner	(Print Name) (Signature)	(Date)	
Local Privacy Act Officer (if applicable)	(Print Name)(Signature)	(Date)	
Chief Privacy Officer	(Signature)	(Date)	
Senior Agency Official for Privacy (SAOP)	 (Signature)	(Date)	