



Affects Members Of the Public?

Department of Energy

Privacy Impact Assessment (PIA)

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	05/16/2022
Departmental Element & Site	FE/NETL/Salesforce Enterprise Platform
Name of Information System or IT Project	Salesforce Enterprise Platform (Project: NETL CORE Initiative Implementation)
Exhibit Project UID	
New PIA <input checked="" type="checkbox"/>	
Update <input type="checkbox"/>	

	Name, Title	Contact Information Phone, Email
System Owner	Mike Knaggs, Research Partnerships & Tech Transfer Associate Director	(O) (304)-285-4926 Michael.Knaggs@netl.doe.gov
Local Privacy Act Officer	Ann C. Guy	(O) 412-386-6167
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Paula Harkleroad, ISSO	(O) 412-386-7231 Paula.Harkleroad@netl.doe.gov
Person Completing this Document	Brad Walls	(O) 304-285-2072 Brad.Walls@netl.doe.gov



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<p>Purpose of Information System or IT Project</p>	<p>Salesforce Enterprise will provide data management, form workflow, and customer relationship management for NETL CORE processes including opportunities for pre-proposal, collaboration opportunities, merit reviews, cost plans, deal negotiations/acceptance, reimbursable work, technology transfer, funds receipt, and project execution for the lab.</p> <p>The system contains PII in the form of work contact and employment information used for administrative (contact) purposes as well as customer relationship management, i.e., assigning personnel to work with customers with whom they've worked successfully in the past to leverage and maintain positive working relationships. For example, if a particular NETL federal employee has worked repeatedly with a particular company or lab in the past with a high closure/completion rate, that employee may consequently be considered for the next engagement with that company or lab.</p>
<p>Type of Information Collected or Maintained by the System:</p>	<ul style="list-style-type: none"> <input type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input checked="" type="checkbox"/> Financial Information (not on individuals) <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 checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify
<p>Has there been any attempt to verify PII does not exist on the system?</p>	<p>PII exists.</p>



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<p>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.</p>	
<p>If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)</p>	<p>N/A</p>

Threshold Questions	
<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	<p>YES</p>
<p>2. Is the information in identifiable form?</p>	<p>YES</p>
<p>3. Is the information about individual Members of the Public?</p>	<p>YES</p>
<p>4. Is the information about DOE or contractor employees?</p>	<p><input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> Contractor Employees</p>

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>42 U.S.C. Section 7101, et seq</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>All information entered into the application is voluntarily provided by individuals as part of their NETL employment.</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, contractor(s) are involved with the development and could be involved in future platform administration of the Salesforce Enterprise platform from the MESA and ITSS contracts. The Privacy Act Clauses were included in their contracts as part of statement of work clauses.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</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 PII consisting of work contact information and general customer engagement data. PII is used for administrative (contact) purposes and for customer relationship management. Should this PII be compromised it could result in personal or professional harm to individuals if perhaps a low completion rate were breached.</p> <p>The system observes a number of protections in contemplation of the Fair Information Practice Principles (FIPPs). The system maximizes individual participation by sourcing PII from individuals. The system observes data minimization by excluding sensitive or extraneous PII. The system observes purpose specification and use limitation by authorizing use of PII only for the specified business purpose. The system furthers data quality and security by implementing a series of administrative and technical controls to safeguard data in the system. Data is encrypted in-transit via HTTPS and at rest within the cloud platform database. The system utilizes role-based access for individuals which are authenticated and verified to be active NETL employees via NETL’s Active Directory via ADFS SAML. Logins with only a username and password are explicitly denied, which ultimately enforces the user be active on NETL’s network.</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>PII is primarily utilized in association for administrative purposes and can only be retrieved by performing searches within the Salesforce platform for users with access to role-based visibility to NETL partnership accounts and their contacts.</p>
<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>A SORN is not required in light of the administrative nature of the PII contained in the system.</p>



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<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>Individuals provide their PII in the course of employment with NETL or engagements with DOE.</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, via data dictionary living artifact which is generatable within the Salesforce enterprise platform.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>Account verification and identifying appropriate contacts for business communication.</p>
<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>N/A</p>
<p>REPORTS</p>	



MODULE II – PII SYSTEMS & PROJECTS

<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>Lead/Opportunity reports, work reports, and a variety of ad-hoc reports.</p>
<p>15. What will be the use of these reports?</p>	<p>Using names allows NETL to identify overloaded resources and the appropriate contacts to target for opportunities where some individuals have higher success rates than others.</p>
<p>16. Who will have access to these reports?</p>	<p>Business Development Manager, Proposal Team Members, Principal investigators, Merit Reviews, Project Managers, Business Management Specialist, Agreement Team Members, Finance & Acquisition, and Legal Counsel.</p>

MONITORING

<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>The system does not and will not monitor individuals.</p>

DATA MANAGEMENT & MAINTENANCE

<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>Records will be kept current by periodic update through manual data entry, AD metadata synchronization, and contact information ingestion.</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>N/A</p>

RECORDS MANAGEMENT



MODULE II – PII SYSTEMS & PROJECTS

<p>22. Identify the record(s).</p>	<p>Financial project records, full name, work email, phone number, and organization.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>Email, Work info: GRS 6.1, Item 010 & 011 Financial Management and Reporting Records, GRS 1.1 Project Files/Documents GRS 5.2, Item 020, DOE ADM 23, Item 5.1, Program specific retention schedules. Information System Security Records: GRS 3.2, Items 020, 030, 031</p>
<p>24. Records Contact</p>	<p>Ryan Morrone, ryan.morrone@netl.doe.gov, 412-386-4669</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	
<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Data is encrypted in-transit via HTTPS and at rest within the cloud platform database. The system utilizes role-based access for individuals which are authenticated and verified to be active NETL employees via NETL's Active Directory via ADFS SAML. Logins with only a username and password are explicitly denied, which ultimately enforces the user be active on NETL's network.</p>
<p>26. Who will have access to PII data?</p>	<p>The following roles could potentially access low-risk PII within SalesForce based on a need to know: System Administrators, Account Managers, Proposal Leads, Proposal Team Members, Principal Investigators, Merit Reviewers, Project Managers, Business Management Specialists, Agreements Team Members, Finance & Acquisition Members, and Legal Counsel.</p>
<p>27. How is access to PII data determined?</p>	<p>Users will be restricted to the access to the data by their role and association with particular accounts which may have contacts associated.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>Data use is entirely internal; there are no DOE lab, HQ, or external connections.</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>



MODULE II – PII SYSTEMS & PROJECTS

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

NETL Privacy Officer and the NETL Authorizing Official.

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
System Owner	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Local Privacy Act Officer	<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/>