



PRIVACY IMPACT ASSESSMENT: DEPARTMENT OF ENERGY
 SAVANNAH RIVER OPERATIONS OFFICE
 EXECUTIVE COMMITMENT ACTION TRACKING SYSTEM
 PIA Template Version 3 – May, 2009

E-1084

Department of Energy
 Privacy Impact Assessment (PIA)

Affects Members Of the Public?	<input checked="" type="checkbox"/>
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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: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

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

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	August 9, 2010	
Departmental Element & Site	Office of Environment Management Department of Energy – Savannah River Operations Office	
Name of Information System or IT Project	Department of Energy Savannah River Operations Office Executive Commitment Action Tracking System	
Exhibit Project UID	UPI Code: 019-60-02-00-01-5000-04	
New PIA	<input checked="" type="checkbox"/>	
Update	<input type="checkbox"/>	
	Name, Title	Contact Information Phone, Email
System Owner	Nick Delaplane, Director, Office of Support Services	(803) 952-8563 nick.delaplane@srs.gov
Local Privacy Act Officer	Pauline Conner, Privacy Act Officer	(803) 952-8134 pauline.conner@srs.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Chris Upshaw, Information Systems Security Officer, DOE-SR	(803) 952-7735 chris.upshaw@srs.gov



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MODULE I – PRIVACY NEEDS ASSESSMENT

Person Completing this Document	Pauline Conner, Privacy Act Officer	(803) 952-8134 pauline.conner@srs.gov
Purpose of Information System or IT Project	<p>The Executive Commitment Action Tracking (ECAT) provides tracking of all official DOE-SR correspondence, assignment and tracking of action by the DOE-SR Office of the Manager, and assignment and tracking of organization actions. In addition, the individuals from a foreign country may request records (e.g., radiation exposure, medical, personnel, etc.) to assist them with filing Energy Employees Occupational Illness Compensation Program Act claims for conditions that may be due to exposures during employment by or for DOE by submitting a Freedom of Information and/or Privacy Act request.</p>	
Type of Information Collected or Maintained by the System:	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> SSN <i>Social Security number</i> <input checked="" type="checkbox"/> Medical & Health Information <i>e.g. blood test results</i> <input checked="" type="checkbox"/> Financial Information <i>e.g. credit card number</i> <input checked="" type="checkbox"/> Clearance Information <i>e.g. "Q"</i> <input type="checkbox"/> Biometric Information <i>e.g. finger print, retinal scan</i> <input checked="" type="checkbox"/> Mother's Maiden Name <input checked="" 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 	
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	No	



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

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
3. Is the information about individual Members of the Public?	YES
4. Is the information about DOE or contractor employees?	YES <input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> 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



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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?	<p>Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 The E-Government Act of 2002, 44 U.S.C. § 101 Federal Records Act (44 U.S.C. § 3301) DOE Directive – DOE O 243.1, “Records Management Program” The Freedom of Information Act, 5 U.S.C. § 552 The Privacy Act, 5 U.S.C. § 552a</p>
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)?	<p>Collection of the information in the ECAT system is required to provide mass storage for electronic image and data files for all record types, as well as respond to inquiries received from Congress, members of the public, federal and contractor employees.</p>
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?	<p>Yes, contractors are involved with the maintenance of the system.</p> <p>Yes, the Brannan Enterprises, Incorporated’s contract contains the appropriate FAR privacy contract clauses.</p>
4. IMPACT ANALYSIS: How does this project or information system impact privacy?	<p>The potential impact is MODERATE. The loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals. Adverse effects on individuals may include, but are not limited to, loss of the privacy to which individual are entitled under law.</p>



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<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>	No.
<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>	N/A
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	N/A
DATA SOURCES	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>The ECAT system collects information from the individual to whom it pertains.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	No



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10. Are the data elements described in detail and documented?	Yes. The vendor's database describes and documents the data elements.
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DATA USE

11. How will the PII be used?	The authorized employees will use the PII contained in ECAT to respond to inquiries. For example, the ECAT will process requests for records (i.e., medical, industrial hygiene, safety data, occupational radiation exposure data, etc) received from Congress, members of the public, federal and contractor employees.
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12. If the system derives meta data, how will the new or meta data be used? Will the new or meta data be part of an individual's record?	No. The ECAT system will not derive any new meta.
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13. With what other agencies or entities will an individual's information be shared?	No. The ECAT system will not share information with other agencies or entities.
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Reports

14. What kinds of reports are produced about individuals or contain an individual's data?	None
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15. What will be the use of these reports?	N/A
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16. Who will have access to these reports?	N/A
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Monitoring

17. Will this information system provide the capability to identify, locate, and monitor individuals?	No. The ECAT does not have the capability to identify, locate, and monitor individuals.
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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?	N/A

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.	ECAT does not verify the accuracy, relevance, and completeness of the data related to the public. ECAT collects basic data directly from the individual to whom it pertains. Therefore, it is determined that the information is accurate, timely and complete at the time it was provided.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	The DOE-SR is the only site that will use this system.

Retention & Disposition

22. What are the retention periods of data in the information system?	Retention periods are in accordance with National Archives and Records Administration (NARA) and DOE records schedules. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm .
23. What are the procedures for disposition of the data at the end of the retention period?	Procedures for disposition are documented in applicable NARA and DOE records schedule. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm .

ACCESS, SAFEGUARDS & SECURITY

24. What controls are in place to protect the data from unauthorized access, modification or use?	Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include annual training emphasizing that it is the individual's responsibility to protect data that they have access to, and that misuse of that data will not be tolerated. The technical controls include restricted access via user-id and password based on user responsibility and job function.
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25. Who will have access to PII data?	DOE-SR and DOE-SR direct support contractor personnel will have access to the data in the systems based on their job responsibilities and function. Furthermore, the appropriate local, and state and federal agencies may have access to certain records maintained in the ECAT to ensure Departmental compliance with other regulatory requirements.
26. How is access to PII data determined?	The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals.
27. Do other information systems share data or have access to the data in the system? If yes, explain.	No. The ECAT will not share data with other information systems or have access to the data in the system.
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?	The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals.

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
PIA Approval Signatures	Original Copy Signed and On File with the DOE Privacy Office	08/24/2010