

PIA Template Version 5 – August 2017



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	3/2/2022	
Departmental Element & Site	Advanced Research Projects Agency –Energy(ARPA-E) Physical Server Location: EITS – AWS East	
Name of Information System or IT Project	Enclave: General Applications Subsystem: FOA (Funding Opportunity Announcement) Portal	
Exhibit Project UID	N/A	
New PIA Update X	On 3/2/2022 there was an update to the name on page 2 to reflect the new ISSO completing this document.	
Name, Title Contact Information Phone, Email		
System Owner	Shane Kosinski ARPA-E, Deputy Director for Operations	202-287-1010 Shane.Kosinski@hq.doe.gov





MODULE I – PRIVACY NEEDS ASSESSMENT		
Local Privacy Act Officer	Brooke Dickson	202-287-5786 Brooke.Dickson@hq.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Kesy Amana ISSO, IM 622	301-903-0496 kesy.amana@hq.doe.gov
Person Completing this Document	Talaat Elnahal ARPA-E ISSO	703-477- 6258 talaat.elnahal@hq.doe.gov
Purpose of Information System or IT Project	talaat.elnahal@hq.doe.gov	





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MODULE I - PRIVACY NEEDS ASSESSMENT The online registration form requests name and business contact information and prompts the applicant to respond to security questions to assist in password recovery. If a user wishes to assist ARPA-E and become a reviewer of applications, they must also indicate whether they are a United States (U.S.) citizen, residing in the U.S. or any of its territories, and submit their resume and/or subject matter expertise information for additional evaluation, before they are granted reviewer access. Additional project submissions may include the names of other project team members and their related qualifications. The ePIC module is used to streamline project reporting and financial monitoring. ARPA-E will collect and store project information, performer (applicants with accepted projects) submitted quarterly reports and invoices, and maintain task and milestone tracking within ePIC, so that the performer, ARPA-E Program Director, and ARPA-E support staff may all access and view the same information in a single. secure, and up-to-date web-based application. Using this web tool, performers may log in to monitor pending invoices, compare actual expenses against their negotiated budget, track reported progress on technical milestones, submit quarterly reports, and view other important project information. ARPA-E's IMPACTS is a data analytics module. This module pulls existing data from the other modules and does not introduce or uncover any new PII. It provides additional assessment information regarding program results and successes. For additional information beyond the scope of this PIA, please consult the ARPA-E website (https://arpa-e.energy.gov). SSN Social Security number Medical & Health Information e.g. blood test results Type of Information Financial Information e.g. credit card number Collected or Maintained by the Clearance Information e.g. "Q" System: Biometric Information e.g. finger print, retinal scan Mother's Maiden Name DoB, Place of Birth





MODULE I – PRIVACY NEEDS ASSESSMENT			
	☐ Criminal History		
	⊠ Name, Phone, Address		
Has there been any attempt to verify PII does not exist on the system?		This is not applicable as PII is contained within 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.			
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)		N/A	
Threshold Questic	ons		
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 ⊠ Federal Employees ⊠ Contractor Employees	
	r (4) Threshold Questions is " No ," you may p o mpleted PNA with signature page to the CPO		





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MODULE I - PRIVACY NEEDS ASSESSMENT

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

1. AUTHORITY

What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?

42 U.S.C. §16538, as amended by America COMPETES Reauthorization Act of 2010 (P.L.111-358). Department of Energy Organization Act, 42 U.S.C. § 7101 et seq.





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MODULE II – PII SYSTEMS & PROJECTS

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)?

Registration is required for members of the public who want to submit an application for financial assistance or to serve as a reviewer of financial assistance applications. Individuals are asked to provide PII (name, business address, email, phone number, and organizational affiliation) when registering for either an applicant or reviewer account. The registration process for reviewer accounts requires individuals to provide additional personal information, including citizenship and resume information.

In order to register, certain personal information is required, while some information (e.g., job title, organization's Dun and Bradstreet (DUNS) number) may be optional. The personal information stored in the system about members of the public is required for DOE to respond to financial assistance applications, facilitate application reviews, and conduct ongoing project management for funded projects. The user submitting the application is required to agree to the following:

"I have reviewed and agree to the terms and conditions in the FOA. I certify as follows: (1) I have reviewed and agree to the terms and conditions in the FOA; (2) this application has not been and will not be submitted by the Principal Investigator (PI) or any Co-PIs to pending ARPA-E Funding Opportunity Announcement(s); and (3) this application is scientifically distinct from other applications that the PI or any Co-PIs have submitted or will submit to pending ARPA-E Funding Opportunity announcement(s).

By clicking the Submit button, I certify that I am authorized to submit on behalf of <Lead Organization Name>."

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. Contractors are involved with the design, development and maintenance of the system. Privacy Act clauses are included in their contracts. Contractors are subject to the requirements under the privacy Act, 5 U.S.C. § 552a and all DOE rules and regulations issued pursuant to Privacy Act.





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The PII involved with this system and its underlying modules is primarily contact information with some resume or qualification information. Although this information may be considered low-impact, DOE has assessed the ARPA-E FOA Portal as a moderate-risk system 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.

Information is provided directly to ARPA-E via the FOA portal by users who undergo the registration process. The process and information required for each FOA can vary, but concept information and any associated project team is initially required. This information can be updated later if the proposal reaches the Full Application stage.

There is a risk that ARPA-E will collect more information than required at the various stages of submission. The risk is partially mitigated by providing a standardized form for registration, and with each FOA providing guidance on its required process and project information. For example, registration information is relegated to business contact information fields, and specific background information (e.g. childhood nickname, maternal grandmother's maiden name) is only collected to establish security questions for password recovery. Resume information (e.g. subject matter expertise) is requested for users who wish to become project reviewers to help determine qualifications for access. Resume information may also be requested of applicants depending on the FOA.

Some FOAs allow applicants to view comments on Full Applications made by authorized reviewers, and they may also allow applicants to upload documents replying to those comments.

Once again, there is a risk that more information may be collected than necessary, or that a user gains unauthorized reviewer access. Both of these concerns are mitigated, as these comments and any file uploaded are only available during a certain period of time specified by the applicable FOA. Users are given guidance to what they need to and should submit. ARPA-E requires all reviewers (internal and external) to complete a Conflict-of-Interest Certification and Nondisclosure Agreement through which they disclose their knowledge of any actual or apparent conflicts and agree to safeguard confidential information contained in Concept Papers, Full Applications, and Replies to Reviewer Comments. No additional information is collected through these forms other than a signature.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?





MODULE II – PII SYSTEMS & PROJECTS		
	Furthermore, ARPA-E trains its reviewers in proper evaluation techniques and procedures. Applicants are not permitted to nominate reviewers for their applications. At any point in the submission process, one may share their submission with other users using the Share Submission feature. Sharing a submission with another user with a registered account will give that user full access to edit project information, view submission decisions, and view reviewer comments for all stages of a FOA if they are available. To mitigate the risk of accidental sharing, the other user must already have an eXCHANGE account. If the user does not have an account then the submission will not automatically be shared, but they can be invited to register for eXCHANGE. This permission can also be retracted at any time by the user sharing the account using the associated "Remove Share" link within the FOA Portal.	
5. SORNs 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.	Yes. The FOA Portal system is designed to retrieve data about individuals using names, email addresses, and application control numbers.	
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.	Yes. DOE-82, Grant and Contract Records for Research Projects, Science Education, and Related Activities, Federal Register, Vol. 74, No. 6, p. 1082 - 1083, Jan 9, 2009.	
7. SORNs If the information system is being modified, will the SORN(s) require amendment or revision?	The SORN does not require modification.	





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MODULE II – PII SYSTEMS & PROJECTS

DATA SOURCES		
8. What are the sources of information about individuals in the information system or project?	Individuals provide their own information, or confirm that they are authorized to provide information on behalf of a team when registering and submitting applications.	
9. Will the information system derive new or meta data about an individual from the information collected?	No. There are no new derived or meta data generated about an individual from the information collected by the FOA Portal.	
10. Are the data elements described in detail and documented?	Yes. Data elements in the FOA Portal system are documented in a database schema.	
DATA USE		
11. How will the PII be used?	The PII collected and stored is for correspondence, inquiry, and user account management purposes in the context of: financial assistance applications with applicants, facilitating application reviews with external and internal reviewers, and conducting ongoing program management with performers.	
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?	N/A	
13. With what other agencies or entities will an individual's information be shared?	External reviewers are able to see the names of applicants and team members on an application/proposal. No other PII is disclosed outside or shared with an outside agency or entity.	
Reports		
14. What kinds of reports are produced about individuals or contain an individual's data?	This system generates reports that contain the contact information for individuals associated with specific application submissions, application reviews, and the status of funded projects. Login and activity data is tracked.	





MODULE II – PII SYSTEMS & PROJECTS		
15. What will be the use of these reports?	User accounts and profiles are used to make reviewer assignments. Status reports are used to contact and correspond with individuals about submissions, application reviews, or the status of funded projects.	
16. Who will have access to these reports?	Reports are available to DOE staff and contractors assigned the following roles in FOA portal system: FOA Administrator, FOA Manager, Program Director, Program Manager, Reviewer Administrator, Tech SETA, PM SETA, Financial SETA, Contract Specialist, Commercialization, Legal, Congressional, Strategic Outreach and System Administrator. Reports are not shared outside of DOE and are not available to the public.	
Monitoring		
17. Will this information system provide the capability to identify, locate, and monitor individuals?	Login and site activity data are tracked by the system. Contact information such as names, phone number and address for registered users is stored by the FOA portal. The FOA portal system allows DOE to ensure the progress of registered users' activities/status within the FOA portal, including: application submission progress, application review progress, and project management status and related activities.	
18. What kinds of information are collected as a function of the monitoring of individuals?	See answer to question 17. The system does not collect any outside information about registered users as a function of overseeing progress of user activities.	
19. Are controls implemented to prevent unauthorized monitoring of individuals?	Yes, controls are implemented to prevent unauthorized monitoring of individuals. Currently, these controls are categorized by the security family name of Access Controls with the unique security identifier of AC as defined in NIST Special Publication 800-53 Rev4. The program team will work to implement Rev5 requirements once the DOE Program Cyber Security Plan has been updated with Rev5 controls.	
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.	In general, individuals can update and edit their PII in the FOA portal. Edits and updates can be made to reviewer information by authorized DOE staff and contractors. In addition, reviewers are required to review and certify their profile information on an annual basis.	





MODULE II – PII SYSTEMS & PROJECTS		
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	
Records Management		
22. Identify the record(s).	Records within this system include: applications and proposals, raw data from accepted projects, project reports, and project management records (timelines, financial documents, status updates, procurement, and other technical documents)	
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	Check appropriately and cite as required. Unscheduled X Scheduled (cite NARA authority(ies) below) GRS 1.2: Grant and Cooperative Agreement Records, item 10, item 20, and item 21.	
24. Records Contact	Hai Duong Hai.Duong@hq.doe.gov (202) 287-6583	
ACCESS, SAFEGUARDS & SECURITY		
25. What controls are in place to protect the data from unauthorized access, modification or use?	Access Controls, including strong passwords and network shares with appropriate permissions, 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 of moderate in accordance with the DOE directives	
26. Who will have access to PII data?	Federal and Contractor employees with business need and responsibilities for maintenance of the system.	
27. How is access to PII data determined?	Based on granted access permissions after determination of valid need-to-know.	





MODULE II – PII SYSTEMS & PROJECTS		
28. Do other information systems share data or have access to the data in the system? If yes, explain.	Yes, the FOA Portal shares data with the EERE Data Warehouse (DW2.0) No other information systems have access to FOA Portal data.	
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?	Yes, there is a signed Interconnection Security Agreement (ISA) and a signed Data Interface Agreement (DIA) between the ARPA-E FOA Portal and the EERE DW 2.0 systems.	
30. Who is responsible for ensuring the authorized use of personal information?	The System Owner is responsible for ensuring appropriate use of the personal information contained within the FOA portal.	
END OF MODULE II		





SIGNATURE PAGE		
	Signature	Date
System Owner	(Print Name)	
	(Signature)	
Local Privacy Act Officer	(Print Name) (Signature)	
Ken Hunt Chief Privacy Officer	(Print Name) (Signature)	

