



PRIVACY IMPACT ASSESSMENT: ORG NAME – SYSTEM NAME
PIA Template Version 3 – May, 2009

Department of Energy
Privacy Impact Assessment (PIA)

Affects Members Of the Public? **X**

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	April 16, 2010	
Departmental Element & Site	Department of Energy, Office of the Chief Information Officer (IM-20). www.energy.gov/open	
Name of Information System or IT Project	DOE Open Government Plan Comment Box	
Exhibit Project UID	N/A	
New PIA <input checked="" type="checkbox"/>	New PIA	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	TheAnne Gordon, Associate CIO for IT Planning, Architecture and E-Government	(202) 586-3705 TheAnne.Gordon@hq.doe.gov
Local Privacy Act Officer	N/A	
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Mike Robertson	(301)903-8028 Michael.Roberston@hq.doe.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Person Completing this Document	Denise Hill, Senior Technical Advisor	(202) 586-5848 Denise.Hill@hq.doe.gov
Purpose of Information System or IT Project	<p>The Open Government Directive (OGD) http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-06.pdf requires that agencies engage the public in providing input to the agency Open Government Plan (www.energy.gov/open). The OGD requires agencies include mechanism for public to:</p> <ul style="list-style-type: none"> • Give feedback on / assessment of the quality of published information • Provide input about which information to prioritize for publication; and • Provide input on the agency's Open Government Plan that agencies include a mechanism the purpose of this system, specifically as it relates to the organization's mission. <p>The purpose of this access file is to provide that mechanism to receive input from the public and follow-up with those submitting comments on the disposition of their comment.</p> <p>This is a different transport (means of receiving messages) that is delivered by an email mask that new email from their own system to send to us. It is a form where all we are doing is making it easier for them to send a conventional email from their own email system (e.g., Outlook, etc.)</p> <p>This is a SORN system.</p>	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN Social Security number <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. finger print, retinal scan <input type="checkbox"/> Mother's Maiden Name	



MODULE I – PRIVACY NEEDS ASSESSMENT

- DoB, Place of Birth
- Employment Information
- Criminal History
- Name, Phone, Address; This database collects name and email address for purposes of responding to their comment.
- Other – Please Specify – This database collects email address as an optional field.

Has there been any attempt to verify PII does not exist on the system?

No.

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 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?

NO

- 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 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?

OMB's Open Government Directive

All agencies have been granted an emergency waiver under the Paperwork Reduction Act to collect this information.



MODULE II – PII SYSTEMS & PROJECTS

<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>This is a voluntary initiative. Individuals submitting comments on the DOE Open Government Plan have the option not to provide information on their email address or affiliation (i.e. company or organization name). Individuals have the option to not have their comment made public (posted on the www.energy.gov/open) site for all to view their comments or suggestions. The information provided is only used to respond to their question or follow-up on their suggestion.</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 appropriate privacy contract is in the contract.</p>
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>Minimal personally identifiable information is collected for the purpose of receiving feedback from the public in support of the Transparency, Collaboration, and Openness goals. The information will not be disclosed beyond the need to respond to the public on their comment. The public voluntarily provides comments and feedback.</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 data will be retrieved by a primary key (Last Name, First Name, and email address)</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>DOE-60</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>No. The Information is not being modified.</p>
DATA SOURCES	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Individual-provided</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>No</p>
DATA USE	
<p>11. How will the PII be used?</p>	<p>The information provided is only used to respond to the question or follow-up on the suggestion. The information will be posted on the www.energy.gov/open web site unless the person selects that they do not want the information posted.</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>None.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>None other than the comments or suggestions that were submitted.</p>
<p>15. What will be the use of these reports?</p>	<p>The comments and suggestions that were submitted will be evaluated for inclusion in the Open Government Plan and/or forwarded to the appropriate Program Office for their action (i.e. suggestion for enhancing openness in energy efficiency programs would be forwarded for consideration)</p>
<p>16. Who will have access to these reports?</p>	<p>Only DOE/OCIO staff with need-to-know authority will monitor, review, and respond to reports contents.</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>Yes. Only staff with need-to-know authority have access to the information.</p>



MODULE II – PII SYSTEMS & PROJECTS

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>The information is provided voluntarily. The accuracy of the information provided is the responsibility of the public submitting the comment to provide their correct name and email address. The staff will not take any action to use any third party sources to verify the accuracy of the name and email information provided. If the provided information is keyed incorrectly or not correct, DOE will not be able to verify for accuracy. PII data will not be collected from sources other than DOE sources.</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>
<h3>Retention & Disposition</h3>	
<p>22. What are the retention periods of data in the information system?</p>	<p>Retention through the life of the Open Government Directive and Program. DOE Administrative Records Schedule 23, item 7 applies.</p>
<p>23. What are the procedures for disposition of the data at the end of the retention period?</p>	<p>Disposition is the information will be archived to the network drive. DOE Administrative Records Schedule 23, item 7 applies.</p>
<h3>ACCESS, SAFEGUARDS & SECURITY</h3>	
<p>24. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Access to the data is limited to staff with need-to-know authorization who are trained on their responsibilities to safeguard records..</p>
<p>25. Who will have access to PII data?</p>	<p>Only DOE /OCIO staff with need-to-know access authority.</p>
<p>26. How is access to PII data determined?</p>	<p>The system owner will make access determinations.</p>
<p>27. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>No. Other systems do not share the data.</p>



MODULE II – PII SYSTEMS & PROJECTS

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?

The system owner and staff responsible for the Open Government Initiative.

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

DOE staff responsible for Open Government activities.

END OF MODULE II