# Department of Energy Privacy Impact Assessment (PIA)

Name of Project: Energy Inspector General Project Tracking System (EIGPT)

**Bureau: Department of Energy** 

**Project's Unique ID:** 019-60-02-00-01-5000-04

Date: June 28, 2007

### A. CONTACT INFORMATION:

### 1) Who is the person completing this document?

Sharon E. Carter, U.S. Department of Energy, IG-12, 1000 Independence Avenue, SW, Washington, DC 20585, 202-586-4130, sharon.carter@hq.doe.gov.

### 2) Who is the system owner?

Linda J. Snider, Assistant Inspector General for Resource Management, U.S. Department of Energy, IG-10, 1000 Independence Avenue, SW, Washington, DC 20585, 202-586-4128, <a href="mailto:linda.snider@hq.doe.gov">linda.snider@hq.doe.gov</a>.

### 3) Who is the system manager for this system or application?

Sharon E. Carter, U.S. Department of Energy, IG-12, 1000 Independence Avenue, SW, Washington, DC 20585, 202-586-4130, sharon.carter@hq.doe.gov.

#### 4) Who is the IT Security Manager who reviewed this document?

Sharon E. Carter, U.S. Department of Energy, IG-12, 1000 Independence Avenue, SW, Washington, DC 20585, 202-586-4130, <u>sharon.carter@hq.doe.gov</u>.

### 5) Who is the Privacy Act Officer who reviewed this document?

Abel Lopez, Director of Freedom of Information Act and Privacy Act Officer, U.S. Department of Energy, MA-74, 1000 Independence Avenue, SW, Washington, DC 20585, 202-586-1653, Abel.Lopez@hq.doe.gov.

#### **B. SYSTEM APPLICATION/GENERAL INFORMATION:**

1) Does this system contain any information about individuals?

### a. Is this information identifiable to the individual<sup>1</sup>?

YES

b. Is the information about individual members of the public?

YES

c. Is the information about DOE or contractor employees? YES

### 2) What is the purpose of the system/application?

The EIGPT System is an in-house database application that is used to track and report the information collected and activities performed on projects involving audits, investigations, inspections, hotline operations, external audits, and special inquiries. The system utilizes a relational database to incorporate these functions and other administrative information, such as:

- personnel,
- timekeeping,
- equipment inventory,
- action items,
- management,
- general projects,
- Freedom of Information Act (FOIA),
- classified document routing,
- investigative file management system, and
- Office of the Inspector General (OIG) reports.

# 3) What legal authority authorizes the purchase or development of this system/application?

Authority for maintenance of this system includes: 42 U.S.C. 7101 et seq.; 50 U.S.C. 2401 et seq.; The Inspector General Act of 1978, as amended, 5 U.S.C. App 3.

#### C. DATA in the SYSTEM:

### 1) What categories of individuals are covered in the system?

The categories of individuals for the OIG Allegation-Based Inspections files include subjects of inspections or inquiries concerning allegations or complaints, individuals who have pertinent knowledge about the inspection or inquiry, individuals authorized to

furnish information, confidential informants, complainants, OIG inspections personnel, and other individuals involved in these inspections.

The categories of individuals for the Investigative Files of the Inspector General include subjects of an investigation, witnesses in an investigation, sources of investigative information, investigative personnel, and other individuals involved in an Office of Inspector General Investigation.

Current and former OIG employees.

### 2) What are the sources of information in the system?

### a. Is the source of the information from the individual or is it taken from another source?

Subject individuals; individuals and organizations that have pertinent knowledge about a subject individual or corporate entity; those authorized by an individual to furnish information; confidential informants; contractor documents and file; the Department of Justice, Federal Bureau of Investigation (FBI); and other Federal, state, and local entities.

### b. What Federal agencies are providing data for use in the system?

Department of); FBI; Government Accountability Office; and other law enforcement agencies.

### c. What Tribal, State and local agencies are providing data for use in the system?

No Tribal information.

### d. From what other third party sources will data be collected?

Informational databases available to the law enforcement community (e.g., NCIC); Government documents and files; contractor documents and files; company documents and files; and publicly available data sources (e.g., newspaper, Internet, etc.).

### e. What information will be collected from the individual and the public?

Information is generally collected in two ways—reactive and proactive. When an individual contacts the OIG regarding an allegation of wrongdoing, the individual is encouraged to provide relevant and specific details of their complaints, including the identity of the person, company, or organization alleged to have engaged in wrongdoing; a description of the alleged impropriety; the DOE facility and program affected by the alleged misconduct; contract numbers;

date(s) of alleged wrongdoing; how the caller is aware of the alleged impropriety; the identity of potential witnesses; and the identity and location of supporting documentation. Upon receipt of a complaint and initiation of a review, the OIG proactively seeks information as it assesses the merits of the allegations or pursues the objective(s) of the review.

Information collected includes names, addresses and phone numbers, and any relevant and specific details on alleged complaints.

### 3) Accuracy, Timeliness, and Reliability

# a. How will data collected from sources other than DOE records be verified for accuracy?

The data in the system is mostly provided by individuals registering complaints or concerns, witnesses interviewed, or documents reviewed by OIG personnel. Therefore, efforts are made to determine that the information is accurate, timely, and complete at the time it is collected. All preliminary data, regardless of the source, will receive further scrutiny and analyses prior to opening an actual review or as an OIG review proceeds. Allegations with limited specificity or merit may be held in abeyance until further, specific details are reported.

### b. How will data be checked for completeness?

Follow-up data collection efforts, including interviews and records reviews.

Allegations with limited specificity or merit may be held in abeyance or closed out until or unless further, specific details are reported.

### c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?

The data in the system is mostly provided by individuals registering complaints or concerns, witnesses interviewed, or documents reviewed by Office of the Inspector General (OIG) personnel. Therefore, efforts are made to determine that the information is accurate, timely, and complete at the time it is collected. All preliminary data, regardless of the source, will receive further scrutiny and analyses prior to opening an actual review or as an OIG review proceeds. Allegations with limited specificity or merit may be held in abeyance until further, specific details are reported.

Follow-up data collection efforts, including interviews and records reviews. Allegations with limited specificity or merit may be held in abeyance or closed out until or unless further, specific details are reported.

### d. Are the data elements described in detail and documented?

Data elements are described and documented in the "EIGPT Data Entry and Query Screen Layouts" document.

### D. ATTRIBUTES OF THE DATA:

1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

All data in the system is relevant and necessary for DOE OIG to perform its statutorily mandated responsibilities.

2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

No.

3) Will the new data be placed in the individual's record?

N/A

4) Can the system make determinations about employees/public that would not be possible without the new data?

N/A

5) How will the new data be verified for relevance and accuracy?

N/A

6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

N/A

7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?

N/A

8) How will data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

Data is retrieved by the individual's name, company name, case number, review or report title, or subject matter.

9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

"Reports" are not generated.

10) 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)?

The OIG, per the Inspector General Act, has the authority to collect information in the performance of its duties. The information is volunteered. OIG activities are conducted pursuant to the Inspector General Act of 1978, as amended, and information collected by the OIG is only used consistent with those authorities.

### E. Maintenance and Administrative Controls:

1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

EIGPT is operated centrally from Headquarters, and accessed by the various OIG field sites. All data is real-time. The OIG program offices have operational procedures, and data is monitored by management and support staff. Open case files and inspection files are securely maintained by OIG employees. Closed files are stored centrally at Headquarters.

2) What are the retention periods of data in the system?

Data retention is in accordance with the OIG's U.S. Department of Energy Records Inventory and Disposition Schedule (RIDS). Actual retention periods vary based on whether data pertains to audits, investigations, inspections, FOIA/PA, etc.

3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Actual retention periods vary based on whether data pertains to audits, investigations, inspections, FOIA/PA, etc. Reports are not produced. Procedures are documented in the OIG's U.S. Department of Energy Records Inventory and Disposition Schedule (RIDS).

4) Is the system using technologies in ways that DOE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No

### 5) How does the use of this technology affect public/employee privacy?

There is no affect. DOE is not using any technologies in a way it has not previously employed.

### 6) Will this system provide the capability to identify, locate, and monitor individuals?

The system does not have the capability to identify, locate and monitor individuals. It provides historical information only.

- 7) What kinds of information are collected as a function of the monitoring of individuals? N/A
- 8) What controls will be used to prevent unauthorized monitoring? N/A.
- 9) Under which Privacy Act system of records notice does the system operate?
- DOE-2: Supervisory Maintained Personnel Files
- DOE-54: Investigative Files of the Inspector General
- DOE-55: Freedom of Information and Privacy Act (FOIA/PA) Request Records
- DOE-58: General Correspondence Files
- DOE-83: Allegation-Based Inspections Files of the Office of Inspector General.
- 10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision?

No.

#### F. Access to Data:

1) Who will have access to the data in the system?

Only OIG employees with a need-to-know [and Application Hosting Environment (AHE) system administrators] have access to the system.

2) How is access to the data by a user determined?

Access to data is determined by evaluation of personnel job responsibilities and organization. Based on the evaluation, the user is assigned permissions that are applied using system access control lists. User accounts are reviewed monthly to identify and

remove users who have left the organization or whose duties no longer require access to the system.

3) Will users have access to all data on the system or will the user's access be restricted?

Access will be restricted by job roles and responsibilities.

4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

Technical and administrative controls are in place to prevent the misuse of data by individuals with access. For EIGPT, the technical controls include restricted access via user-id and password based on user responsibility and job function. Rules of behavior and consequences for violating the rules are displayed to the user each time the user logs onto the application. Administrative controls include separation of duties so individuals only have access to appropriate personal information. For case files and inspection files, access is controlled by maintaining files in secure containers and offices.

5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?

Yes. Contractors have a minor role in the design, development, and maintenance of the EIGPT application system. Those individuals are subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a. Contractors have no role in case files and inspection files.

Pertinent contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need-to-know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and the requirements of DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.

6) Do other systems share data or have access to the data in the system? If yes, explain.

No other systems share data or have direct access to the data in the system.

7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

N/A

8) Will other agencies share data or have access to the data in this system?

No.

9) How will the data be used by the other agency?

N/A

10) Who is responsible for assuring proper use of the data?

Linda J. Snider, IG-12 Assistant Inspector General for Resource Management U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585 202-5868-4128

### The Following Officials Have Approved this Document

1)	EIGPT System Owner
	Name: Linda J. Snider (Signature) 6/29/07 (Date)
	Title: Assistant Inspector General for Resource Management, Office of Inspector General
2)	Privacy Act Officer
	Name: Abel Lopez (Signature) 1/6/67 (Date)
	Title: Director, Freedom of Information Act and Privacy Act Officer
3)	Senior Agency Official for Privacy  Adunt of Mane: Ingrid A.C. Kolb  Senior Agency Official for Privacy  (Signature) 7   10   07 (Date)
	Title: Senior Agency Official for Privacy