



Affects
Members
Of the Public?

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: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

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	April 21, 2017	
Departmental Element & Site	Office of Energy Efficiency and Renewable Energy, Golden Field Office, National Renewable Energy Laboratory	
Name of Information System or IT Project	NREL Emergency Notification System (Cloud Hosted Service – Rave)	
Exhibit Project UID	DOE Contract DE-AC36-08GO28308.	
New PIA <input checked="" type="checkbox"/>		
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Joe Thill, Director, Office of Security and Emergency Preparedness	303-275-4645 Joe.Thill@nrel.gov
Local Privacy Act Officer	Michele Altieri/DOE, Golden Field Office, Privacy Act Officer	720-356-1427 Michele.Altieri@ee.doe.gov
Cyber Security Expert reviewing this	Bob Gladu, NREL ISSO	303-275-4009 Bob.Gladu@nrel.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

document (e.g. ISSM, CSSM, ISSO, etc.)		
Person Completing this Document	Bob Gladu, NREL ISSO Kaycee Edwards, Mission Support Group Manager	303-275-4009 Bob.Gladu@nrel.gov 303-275-3702 Kaycee.Edwards@nrel.gov
Purpose of Information System or IT Project	The Emergency Notification System is used by NREL to enable 24 hour contact with NREL internal emergency responders. These are NREL staff that may be called upon during an event to assist in emergency response activities and marshal a coordinated, unified response during any larger events where external responders arrive on scene. NREL staff may opt in to the service, so that they receive information of events that may impact NREL facilities or activities, i.e. site delayed opening or closures due to unexpected event (wildland fire) or inclement weather.	
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 <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify (Name, cellular phone numbers, and electronic mail addresses.)	
Has there been any attempt to verify PII does not exist on the	N/A.	



MODULE I – PRIVACY NEEDS ASSESSMENT

<p>system?</p> <p>DOE Order 206.1, <i>Department of Energy Privacy Program</i>, defines PII as any information <i>collected or maintained by the Department</i> 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>	N/A
<p>Threshold Questions</p>	
<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	YES
<p>2. Is the information in identifiable form?</p>	YES
<p>3. Is the information about individual Members of the Public?</p>	NO
<p>4. Is the information about DOE or contractor employees?</p>	<p>YES</p> <p><input checked="" type="checkbox"/> Federal Employees</p> <p><input checked="" type="checkbox"/> Contractor Employees</p>
<p>If the answer to <u>all</u> 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.</p>	
<p>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.</p> <p>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.</p> <p>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.</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

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?	U.S. Department of Energy Contract No. DE-AC36-08GO28308. Federal Register (2009), DOE-11, Emergency Operations Notification Call List
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)?	NREL automatically enrolls all recipients of NREL issued work cell phones. The Emergency Notification System is also a voluntary enrollment system for employees that want to register their personal cell phones for notification. There is no requirement or expectation for employees to enroll their personal cell phones.
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?	No, this is a public Cloud Service. N/A.



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS: How does this project or information system impact privacy?</p>	<p>Use of the Emergency Notification System is not expected to impact privacy of the individuals involved.</p>
<p>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.</p>	<p>The data is retrieved using the individual's name.</p>
<p>6. SORNs Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>? If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>Yes. DOE-11, Emergency Operations Notification Call List Federal Register, Vol. 74, No. 6, Friday, January 9, 2009.</p>
<p>7. SORNs 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>Phone records for NREL issued cell phones and user supplied information for privately owned cell phones through voluntary enrollment.</p>



MODULE II – PII SYSTEMS & PROJECTS

9. Will the information system derive new or meta data about an individual from the information collected?	No.
10. Are the data elements described in detail and documented?	Yes.
DATA USE	
11. How will the PII be used?	The PII will be used to make emergency notifications to enrolled individuals.
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?	None.
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	None.
15. What will be the use of these reports?	N/A.
16. Who will have access to these reports?	N/A.
Monitoring	



MODULE II – PII SYSTEMS & PROJECTS

<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>N/A</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>The NREL cell phone information will be uploaded from an NREL maintained cell phone database.</p> <p>For voluntary enrollment by individuals, it will be up to the individual to maintain the information. Individuals that enroll on their own must create a user name and password for maintenance.</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

<p>22. Identify the record(s).</p>	<p>Each entry can contain up to a name, work or private cell phone number, and email address(es). For data entered by the self-enrolling individual, it can be a smaller set of information than listed above.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>General Records Schedule 5.3: Continuity and Emergency Planning Records, item 020 Employee Emergency Contact Information, Item 020, DAA-GRS-2016-0004-0002.</p>
<p>24. Records Contact</p>	<p>Megan Kaiser, NREL Records Management, megan.kaiser@nrel.gov, 303-275-4642</p>

ACCESS, SAFEGUARDS & SECURITY

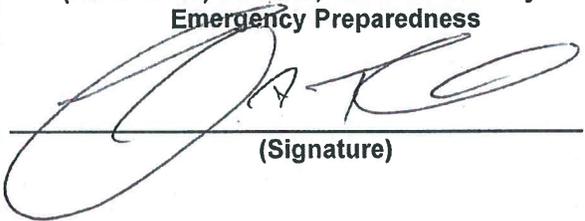
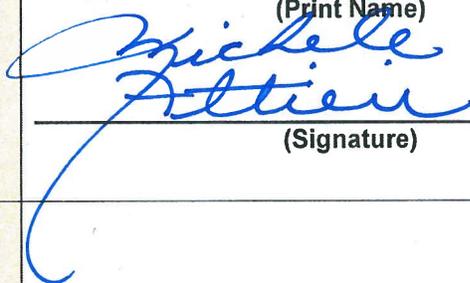


MODULE II – PII SYSTEMS & PROJECTS

<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>It is a GSA Approved Emergency Notification Cloud Service. Cloud Service Provider details can be found here: https://www.ravemobilesafety.com/anti-terrorism-technologies-safety-act/</p>
<p>26. Who will have access to PII data?</p>	<p>Emergency Notification System database administrator(s), who are NREL employees.</p>
<p>27. How is access to PII data determined?</p>	<p>Access is granted based on roles and is approved by the NREL Director, Office of Security and Emergency Preparedness</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>No.</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>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>Joe Thill – System Owner.</p>

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
System Owner	<p><u>Joe Thill</u> (Print Name) Director, Office of Security and Emergency Preparedness</p> <p> (Signature)</p>	<p><u>4-25-17</u></p>
Local Privacy Act Officer	<p><u>Michele Altieri, Golden Field Office</u> (Print Name)</p> <p> (Signature)</p>	<p><u>26 Apr 17</u></p>
Jerry Hanley Chief Privacy Officer	<p>_____ (Print Name)</p> <p>_____ (Signature)</p>	