Affects Members Of the Public?	X

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	May 14, 2020
Departmental Element & Site	IM50 - ServiceNow Enterprise Data Analytics Repository System (eDARS) hosted on the federal ServiceNow SaaS cloud in Culpeper, VA and operated by IM50.
Name of Information System or IT Project	ServiceNow Enterprise Data Analytics Repository System (eDARS) COVID Tracking System (custom application)
Exhibit Project UID	N/A
New PIA [X] **Update** [ ]	New component PIA to be under the umbrella of the eDARS application and the eDARS PIA dated July 12, 2018

	Name, Title	Contact Information Phone, Email
System Owner	Wende Wiles	(301)903-0559 Wende.wiles@hq.doe.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Ken Hunt Chief Privacy Officer	202-586-8695 Ken.hunt@hq.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Ololade Ademiluyi IM50 Information System Security Officer (ISSO)	Ololade Ademiluyi 443-333-6156 Ololade.ademiluyi@hq.doe.gov
Person Completing this Document	Wende Wiles (SO)	301-903-0559 Wende.wiles@hq.doe.gov
Purpose of Information System or IT Project	The DOE COVID Tracking System, hosted on the eDARS system (ServiceNow), was built as a tool to automate reporting and tracking workflows regarding the COVID health status of DOE federal and contractor employees reported by individuals, supervisors, and sites/labs to the COVID-19 call hotline and electronic mailbox. Aggregated non-identifying reports are generated for DOE senior leadership based on the information. The tool will be used by the DOE COVID-19 Response Team, which is housed in the Office of Management (MA). The potential for expansion of access and use of this tool beyond DOE headquarters is under consideration by DOE senior leadership and will be addressed through a future update to this PIA, if adopted. This tool is necessary to provide the Department with a centralized, Headquarters' based view of COVID impacts to the DOE workforce comprised of both federal employees and contractor staff at DOE offices, facilities, and contractor sites, including the national laboratories. The tool streamlines the reporting process and protocols established by MA in the early days of DOE's COVID response. The COVID Tracking System allows for the DOE COVID Response Team to identify the status of reported cases and to inform reopening decisions as well as conduct limited contact tracing to ensure the health of the entire DOE workforce. The DOE COVID Tracking System is a database providing a platform to collect initial reports and track status updates from the designated organizational units over time. Data is collected through a questionnaire that has been built into the system. Collected data includes indication of employees/contractors who have: reportable COVID symptoms; a COVID diagnosis; testing status; quarantine status (self or mandated); completion of quarantine period; recovery; and any reported deaths. Each report/reporting individual will be assigned a case number which is unique to the COVID Tracking System and will only be used for this purpose. Individuals may request anonymity; in cases where anonymity has been requested by the individual, the name field is replaced with "anonymous" in the general case management system log.

PRIVACY
P R O G R A M

MODULE I – PRIVACY NEEDS ASSESSMENT

	The DOE COVID Tracking System will be used for internal DOE reporting of active and closed reported cases of COVID by facility. A daily summary report is prepared for DOE senior leadership with aggregated metrics, which may be used for DOECASTs.

Contact tracing of the individual's movements and interactions is an important part of the COVID Response Team's case management process. Internal to DOE, the COVID Response Team will work with the supervisor and/or the employee/contractor to identify when the employee was last in a DOE or other Federal building. In addition, the Response Team and supervisor will identify anyone in the workspace with whom the individual may have had close contact (within a six foot contact radius). Employees who may have had close contact at work with the potentially infected individual will be identified and notified of the potential close contact; the individual may elect not to allow their name to be disclosed to other employees/contractors during the notification process. DOECASTS are used to inform all DOE employees/contractors of confirmed cases within their assigned facility (non-identified) and the date the confirmed individual was last in the facility space. External to DOE, MA may share limited information (name, COVID status) with local health departments for the purpose of assisting with contact tracking when a COVID case involving a DOE employee or contractor is reported to the Department. MA may also inform another federal agency of potential exposure if the reporting individual attending a meeting at another agency's facilities during the exposure/incubation period.

The eDARS environment is built on the ServiceNow FEDRAMP-High SaaS platform and is authorized to collect and maintain PII and sensitive information. The COVID Tracking System module is being built with elevated access controls, limiting module access to the IM50 development team and the customer support team, which includes members from MA, the Office of Environment, Health, Safety, and Security (AU), and the Office of Enterprise Assessments (EA). Audit logging is structured to allow MA to track all changes to an individual's record and who made them. Restrictions will also be implemented in an Application Data Management Agreement (ADMA) between MA and IM50, documenting MA's protection of the sensitive data collected, used, and maintained in the COVID Tracking System, including data sharing restrictions and access limitations, role-based management, and account credential provisioning.

A copy of the COVID Response Team protocol document and the questionnaire is attached to this PIA. These documents will redacted from publication on the DOE website. |
| **Type of Information Collected or Maintained by the System**: | ☐ SSN

☒ Medical & Health Information - self reported status of a reported individual (confirmed, possible, cautionary, other); status of quarantine (self-quarantine, |

MODULE I – PRIVACY NEEDS ASSESSMENT

mandated quarantine, completion); reported death; reporting of confirmed status to local health department/official

☐ Financial Information

☐ Clearance Information

☐ Biometric Information

☐ Mother's Maiden Name

☐ DoB, Place of Birth

☒ Employment Information – employee/contractor name (no DOE employee numbers will be used for this purpose. For contractor employees, the name of the individual's employing company will also be captured. The name and contact information of the interviewing employee (COVID Response Team member or site personnel) completing the questionnaire will also be collected.

☐ Criminal History

☒ Name, Phone, Address – work contact information of the individual; minimal personal contact info (e.g., phone number, location) of the individual when necessary. The name and contact information for a third-party (e.g., spouse, partner, friend, co-worker, supervisor) who submits a report on behalf of a DoE employee or contractor will be captured and may be used to contact the reporter if the affected individual cannot submit a report for themselves or respond to follow-up contact by MA.

☒ Other – **assigned case number (unique to this system and use);** responses to support contact tracing and reporting to local health officials.

Has there been any attempt to verify PII does not exist on 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.*	N/A – DOE OCIO built the system from the ground up and know all of the data attributes, including PII.
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	None – see note above.

MODULE I – PRIVACY NEEDS ASSESSMENT

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?	NO
4. Is the information about DOE or contractor employees?	YES ☒ 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 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

MODULE II – PII SYSTEMS & PROJECTS

1. **AUTHORITY** **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	The Atomic Energy Act of 1954; Public Health Service Act, 42 U.S.C 6A; 42 U.S.C. 7101 et seq.; 50 U.S.C. 2401 et seq.; DOE Order 440.1, The Privacy Act of 1974 (5 U.S.C. § 552a) and 10 CFR § 1008 authorizes the collection of this information.

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)?**	The information collected is reported through the DOE hotline and electronic mailbox by individuals or third party individuals representing the DOE employee/contractor (e.g., spouse, partner friend, co-worker or supervisor). All reporting is voluntary and can be anonymous, if requested. There is no requirement for employees/contractors to provide DOE with any information. The questionnaire was established to help MA and the COVID Response Team determine an employee/contractor's relative risk based on the exposure(s) and to take actions based on that risk. MA/COVID Response Team also uses the responses to help determine which other DOE employees/contractors or others could be at increased risk of exposure (close contacts; areas to be cleaned). If an employee refuses to provide the information, the MA/COVID Response Team will use the available information to make the best decisions possible, given the circumstances. Information is collected through a standardized questionnaire developed by MA for this purpose. The questionnaire form includes a Privacy Act Statement of the inclusion of this information under DOE Privacy Act system of records, DOE-33, Personnel Medical Records. Any individual who self-reports is explicitly asked if they consent to the use of their name to contact others who have been in close contact with the reporting individual and to disclose to a local health department/official based on the circumstances of the case. In cases where a third party is reporting on behalf of a DOE employee or contractor, the Department may ask the reporter to confirm that the affected individual is not able to consent for themselves. The COVID Response Team maintains a separate anonymity log that has the name of the individual and the assigned case number which has limited access to only those with a specific need-to-know the identity of the individual. In cases where anonymity has been requested by the individual, the name field is replaced with "anonymous" in the general case management system log.

MODULE II – PII SYSTEMS & PROJECTS

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. The Contractors supporting development of the new COVID application have signed DOE Non-Disclosure Agreements (NDAs) including a specific assurance against sharing sensitive data: *"g) Whenever DOE furnishes any Information, I, the recipient, will use such information only for the purposes stated in a task or subtask assignment and to treat the information obtained in confidence. Further, I will not use such information for my own private gain or the private gain of others. This requirement for confidential treatment applies to information obtained from any source, including the submitter, without restriction."*

MODULE II – PII SYSTEMS & PROJECTS

4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	This system collects name, contact information, and medical PII which is self-reported by employees/contractors and by third parties (e.g., spouse, partner, friend, co-worker, or supervisor) on behalf of an employee/contractor). The purpose of the eDARs COVID system is to automate a manual information collection and case management process, while producing aggregate statistics and trends analysis of the reported COVID cases of DOE employees/contractors at DOE facilities and sites. In cases where an affected individual attended a meeting at another agency's facility, DOE will notify the other agency of the potential exposure of their employees/contractors. If PII collected, used, and maintained in this system is disclosed to unauthorized parties, the sensitivity of an employee and contractor COVID status information could compromise employer trust relationships and cause embarrassment or harm to the employee/contractor whose information was exposed. If data was shared with authorization for use in emerging technologies such as artificial intelligence without removing identifiable information, parties other than the intended customer data owners and stewards would have knowledge of specific individuals and their medical status. An additional safeguard is the option for an individual to request anonymity. In cases where anonymity has been requested by the individual, the name field is replaced with "anonymous" in the general case management system log. The COVID Response Team maintains a separate anonymity log that has the name of the individual and the assigned case number which has limited access to only those with a specific need-to-know the identity of the individual. The COVID-19 Response Team Leads (DOE MA and AU) have established protocols governing the collection of PII for this purpose and will work with OCIO, the eDARS provider, to ensure that technical safeguards are in place to protect the PII maintained in the system, including role-based authorized access to specific types of information such as the names of individual who requested anonymized cases.

MODULE II – PII SYSTEMS & PROJECTS

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.**	Name or assigned case number may be retrieved.
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*.**	The information collected through the questionnaire is covered by a DOE Privacy Act system of records, DOE-33, Personnel Medical Records at 74 FR 1032, January 9, 2009, as determined by Department of Energy Headquarters General Counsel. Employees may report their COVID status to a supervisor, which may result in a record which is also covered under DOE-2, DOE-Personnel Supervisor Maintained Personnel Records.
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	No

DATA SOURCES

MODULE II – PII SYSTEMS & PROJECTS

8. What are the sources of information about individuals in the information system or project?	Reported cases are received from different sources. The majority of reports will be information self-reported by employees/contractors, or information reported by designated organizational COVID-reporting points of contact. Reports regarding an affected individual may also be submitted by an employee's supervisor, a contractor's employing company representative, or a third party associate of an employee/contractor (i.e., family, friend, or other point of contact) when the affected individual requires assistance in reporting their COVID status. At this point, all reports inputted into the COVID Tracking System are received through a phone hotline and/or electronic mailbox monitored by DOE COVID Response Team members. Report information is collected in line with a standardized questionnaire developed by MA for this purpose. Follow-up information collection is done in line with established protocols.
9. Will the information system derive new or meta data about an individual from the information collected?	There will be no aggregation of data with data from other sources except the addition of geospatial coordinates of the workplace of the individual for showing the data on a map.
10. Are the data elements described in detail and documented?	Yes. Data attributes are defined by MA. Training documents are available to educate users on what information should be inputted into the tool. Within the tool, definitions and guidance are built into the system design and can be accessed when a system user holds their mouse pointer over a question mark icon by the data element (i.e., hover over hints).
DATA USE	

MODULE II – PII SYSTEMS & PROJECTS

11. How will the PII be used?	The data will be used to track the status of reported COVID cases and to inform DOE senior leadership of the status of cases across DOE facilities and sites to inform response decisions. The PII of specific individual is maintained in individual report records with assigned case numbers. Individuals may request anonymity, In cases where anonymity has been requested by the individual, the name field is replaced with "anonymous" in the general case management system log and a separate log of anonymized cases is maintained for those COVID Response Team members with a need-to-know the identity of an anonymized case. The COVID Response Team may use the PII of specific individuals to inform local health departments/local health officials when necessary to support contact tracing and consented to by the individual. Outside of contact tracking, there are no other planned uses of the PII of specific 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?**	No – this data is targeted for COVID response only and will not be aggregated with other systems or kept as part of employee / contractor records. Periodic reviews of the data will occur to ensure data accuracy, data quality, and relevance to COVID response activities. Deletion or destruction of information maintained in the tool including PII, will be based on the continued need for the information and in line with applicable records schedules.
13. With what other agencies or entities will an individual's information be shared?	In cases where a reported case involves an individual who attended a meeting at another agency's facility during the exposure/incubation period, the COVID Response Team will notify the other agency about the circumstances of the exposure to their employees.

REPORTS

14. What kinds of reports are produced about individuals or contain an individual's data?	Daily reporting and status dashboards will use aggregated data to generate statistics and trends analysis. No reporting or analysis will be done on an individual's reported status outside of the use of PII to support contact tracing. Access and sharing of PII for contact tracing will be limited to those with a need-to-know and an authorized recipient of sensitive information (such as a local health department or local health official.

P R I V A C Y
P R O G R A M

MODULE II – PII SYSTEMS & PROJECTS

15. What will be the use of these reports?	No reporting of identified individuals is planned. Reports will include aggregated metrics and facility location.
16. Who will have access to these reports?	IM50 Federal Product (Application) Owner, IM50 eDARS Administrators (2 individuals), IM50 eDARS Development team (3 individuals), MA application central team (3 individuals), the MA-designated members of the COVID-19 Response Team (about 20 individuals), MA designated DOE organizational PoCs submitting updates. Organizational PoCs will see only the data they submitted, not the other organizations'.

MONITORING

17. Will this information system provide the capability to identify, locate, and monitor individuals?	No – there will be no automated monitoring of specific individuals.
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A. Information may be collected from the individual or the individual's supervisor for the purpose of conducting contact tracing. DOE is limiting the collection of information, such as identifying other employees or contractors who came within a 6 ft distance of the reported individual while at a DOE facility.
19. Are controls implemented to prevent unauthorized monitoring of individuals?	No automated monitoring of individuals.

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.	Updates to information stored will be collected through the hotline and an electronic mailbox from self-reporting individuals, supervisors, and other contacts, and from designated points of contact.
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 system has been built per MA/COVID Response Team requirements, is stand-alone from any other system, and there is only one.

PRIVACY
P R O G R A M

MODULE II – PII SYSTEMS & PROJECTS

RECORDS MANAGEMENT

22. Identify the record(s).	Case records will be stored and disposed of per the eDARS Service Now record schedule. This system automates a previously manual process (paper and Excel spreadsheet files) and both manual "paper" records and the electronic records maintained in the eDARS system will be maintained. A decision has not been made yet regarding whether the original manual records will be inputted into the eDARS to create a combined official record at a later date.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	Scheduled under DAA-GRS-2017-0010-0009
24. Records Contact	Tom Saldari, 301 903-8656.

ACCESS, SAFEGUARDS & SECURITY

25. What controls are in place to protect the data from unauthorized access, modification or use?	This application was built on the IM50 eDARS ServiceNow platform. The system was certified and accredited in 2017 and found to have mitigated risk to an acceptable level. This new PIA has been created and the FIPS199 categorization document updated to reflect this application's health data. eDARS has implemented access controls and account management per customer requirements and implemented all of the FEDRAMP High infrastructure and application controls minus an exemption for timeout. All members of the IT support contractor team have signed Non-Disclosure Agreements on file.
26. Who will have access to PII data?	IM50 Federal Product (Application) Owner, IM50 eDARS Administrators (2 individuals), IM50 eDARS Development team (3 individuals), MA application central team (3 individuals), the MA-designated members of the COVID-19 Response Team (about 20 individuals), MA-designated DOE organizational PoCs submitting updates.

PRIVACY
P R O G R A M

MODULE II – PII SYSTEMS & PROJECTS

27. How is access to PII data determined?	Currently, access to PII data is limited to COVID Response Team members with an authorized need-to-know and access the PII of DOE employees and contractors. DOE senior leadership is considering whether to expand access to the general facility reporting status and trends analysis sections of the tool to DOE office/site authorized points of contact designated by MA. DOE office/site points of contact will be limited to access/viewing of only the data submitted for that office/site, and not data submitted by other DOE organizations. Personnel with specific roles and responsibilities related to COVID-19 Response Team will be able to access and view all submissions.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	There are no planned system integrations.
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?	N/A
30. Who is responsible for ensuring the authorized use of personal information?	For the IM50 Contract team, the lead is Jackie Tirona at Mobile: 703-507-6144. Cherylynne Williams of MA at 202-586-1005 is responsible for authorizing and training all non-IM50 users on proper use and protections.

END OF MODULE II

	Signature
System Owner	_____ (Print Name) _____ (Signature)
Application / Data Owner	_____ (Print Name) _____ (Signature)
Local Privacy Act Officer	_____ (Print Name) _____ (Signature)
Ken Hunt **Chief Privacy Officer**	_____**Ken Hunt**_____ (Print Name) _____ (Signature)