Department of Energy
Privacy Impact Assessment (PIA)


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### MODULE I – PRIVACY NEEDS ASSESSMENT

<table>
<thead>
<tr>
<th>Date</th>
<th>May 4, 2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Departmental Element &amp; Site</td>
<td>Office of Fossil Energy, National Energy Technology Laboratory (NETL), Morgantown, WV. The CHRIS system is housed in NETLs computer room in Building B2.</td>
</tr>
<tr>
<td>Name of Information System or IT Project</td>
<td>Corporate Human Resources Information System (CHRIS)</td>
</tr>
<tr>
<td>Exhibit Project UID</td>
<td>019-60-01-17-01-1010-00-403-231</td>
</tr>
<tr>
<td>New PIA</td>
<td>☐</td>
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<tr>
<td>Update</td>
<td>☑</td>
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<tr>
<td>CHRIS PIA May 7, 2008</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Name, Title</th>
<th>Contact Information Phone, Email</th>
</tr>
</thead>
</table>
| System Owner: Robert K Briede | 202-586-7475  
  robert.briede@hq.doe.gov |
| Data Owner: Sarah J Bonilla | (202) 586-8261  
  sarah.bonilla@hq.doe.gov |
## Module I - Privacy Needs Assessment

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robert.briede@hq.doe.gov |

### Purpose of Information System or IT Project

The CHRIS system is a major application supporting HR Management throughout all of the DOE. This system addresses the entire Federal enterprise with functionality designed specifically to meet government requirements including support for the following:

- **Personnel Actions Request (PAR)** supports the Standard Form (SF)-52 and other personnel documents for processing employee appointments, reinstatements, transfers, promotions, separations, retirements, and terminations. Leave, furloughs, and changes in tenure are also supported.

- **Position Management and Classification** tracks position data in addition to employee data and also supports management of a position description library, permitting budgeting at any organizational level needed.

- **Staffing and Recruiting** functionality enables the creation of vacancy announcements and the evaluation of applicants. With its support for imaging and scanning products, redundant data entry is eliminated; captured data can be submitted through the workflow oriented SF-52 document process.

- **Salary Administration** maintains up-to-date compensation plans and processes locality adjustments, pay adjustments, allowances, differentials, and
MODULE I – PRIVACY NEEDS ASSESSMENT

- Performance Management handles the awards budgeting process and tracking monetary awards, non-monetary awards, special (time-off) awards, and quality step increases.

- Training Administration supports a workflow/paperless oriented training environment; the Request, Authorization, Agreement, and Certification of Training (SF-182) process; and individual development plans (IDPs). Training programs and courses may be associated with positions. Facilities, instructors, equipment, materials, and costs can be tracked; enrollment letters, confirmation letters, and course completion certificates can be produced.

- Benefits Administration supports a workflow process for employees to view and update their benefits information in the system.

- eOPF. Employee and Notification of Personnel Actions (SF 50) files are transferred weekly from the CHRIS/PeopleSoft database to the eOPF servers owned by OPM and physically located in Denver, CO. These files ensure that employee data as well as all SF 50 actions are kept up to date in each employee’s eOPF. They are transferred weekly via a secure Virtual Private Network (VPN) and will continue into the future. This is in direct support of the e-Government Act of 2002 (Public Law 107-347).

Type of Information Collected or Maintained by the System:

- SSN Social Security number
- Medical & Health Information e.g. blood test results
- Financial Information e.g. credit card number
- Clearance Information e.g. "Q"
- Biometric Information e.g. fingerprint, retinal scan
- Mother’s Maiden Name
- DoB, Place of Birth
- Employment Information
- Criminal History
## MODULE I – PRIVACY NEEDS ASSESSMENT

- **Name, Phone, Address**
- **Other – Please Specify**

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

**YES**

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)  

Information is reviewed by DOE officials to verify if PII is contained in the system.

### 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?**  
   **NO**
   *(CHRIS does not continue to collect information on former employees or contractors.)*

3. **Is the information about individual Members of the Public?**  
   **YES**

4. **Is the information about DOE or contractor employees?**
   - **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.
MODULE I – PRIVACY NEEDS ASSESSMENT

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

<table>
<thead>
<tr>
<th>AUTHORITY, IMPACT &amp; NOTICE</th>
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<tbody>
<tr>
<td><strong>1. AUTHORITY</strong></td>
</tr>
<tr>
<td>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</td>
</tr>
<tr>
<td><strong>2. CONSENT</strong></td>
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<tr>
<td>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)?</td>
</tr>
<tr>
<td>The information in the CHRIS system is required for individuals to be employed by DOE. This information is necessary in order for DOE to properly pay and administer benefits to employees, track performance and meet training needs.</td>
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</table>
## MODULE II – PII SYSTEMS & PROJECTS

### 3. CONTRACTS

<table>
<thead>
<tr>
<th>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?</th>
</tr>
</thead>
</table>

Yes, contractors were involved in the design and development and are involved in the maintenance of the system. Personal information from CHRIS may be disclosed to these contractors and their officers and employees in performance of their contracts. Individuals provided these types of information are subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

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 the 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.

### 4. IMPACT ANALYSIS:

<table>
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<tr>
<th>How does this project or information system impact privacy?</th>
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The unauthorized disclosure of information could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals. The current implementation of the CHRIS security controls mitigates any impact on privacy.

### 5. SORNs

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<tr>
<th>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.</th>
</tr>
</thead>
</table>

Data may be retrieved by name, employee id, social security number, and organization.
### MODULE II – PII SYSTEMS & PROJECTS

#### 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 system operates under the following DOE Privacy Act systems of records:

- OPM – Govt-1 Personnel Records
- DOE – 2 Supervisory Maintained Personnel Records
- DOE – 28 General Training Records

#### 7. SORNs

If the information system is being modified, will the SORN(s) require amendment or revision?

Based on current and planned activities, the SORN will not require amendment or revision.

### DATA SOURCES

#### 8. What are the sources of information about individuals in the information system or project?

Employee provided

#### 9. Will the information system derive new or meta data about an individual from the information collected?

The system generates new data concerning an individual in accordance with approved personnel actions (e.g., performance award, position change, promotion, retirement, etc.). U.S. Office of Personnel Management through eOPF is creating an online repository for Official Personnel Files (OPFs). This data is filed and maintained as part of the individual’s record.

### DATA USE

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

Yes, data elements are described in the CHRIS Users Manuals.
### MODULE II – PII SYSTEMS & PROJECTS

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### MODULE II – PII SYSTEMS & PROJECTS

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<tr>
<th>Question</th>
<th>Description</th>
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<tbody>
<tr>
<td>12. If the system derives meta data, how will the new or meta data be used?</td>
<td>The data is used to administer HR Management requirements for DOE federal employees. Data about members of the public is limited to historical federal employment data.</td>
</tr>
<tr>
<td>Will the new or meta data be part of an individual’s record?</td>
<td></td>
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<tr>
<td>13. With what other agencies or entities will an individual’s information be shared?</td>
<td>OPM. Employee and Notification of Personnel Actions (SF 50) files are transferred weekly from the CHRIS/PeopleSoft database to the eOPF servers owned by OPM and physically located in Denver, CO. These files ensure that employee data as well as all SF 50 actions are kept up to date in each employee's eOPF. They are transferred weekly via a secure Virtual Private Network (VPN) and will continue into the future. This is in direct support of the e-Government Act of 2002 (Public Law 107-347).</td>
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<tr>
<td>14. What kinds of reports are produced about individuals or contain an individual’s data?</td>
<td>The system allows authorized DOE HR staff to produce reports on individuals or groups of individuals. The following reports may be produced by authorized HR staff:</td>
</tr>
</tbody>
</table>
|                                                                         | • Alpha List of Active Employees  
|                                                                         | • Awards Report  
|                                                                         | • Bargaining Unit Employees  
|                                                                         | • Organization (Profile) Report  
|                                                                         | • Social Security Number List of Active Employees  
| The details of these reports are defined in the CHRIS User's Manual.    |                                                                                                                                                                                                            |
| 15. What will be the use of these reports?                              | These reports will be used only to perform required HR functions and activities.                                                                                                                            |
| 16. Who will have access to these reports?                              | System Administrators, HR Project Administrators, HR users, and Personnel Offices                                                                                                                             |
### MODULE II – PII SYSTEMS & PROJECTS

17. **Will this information system provide the capability to identify, locate, and monitor individuals?**
   - Yes, the purpose of this system is to allow authorized DOE HR staff to properly administer HR functions and activities and to accurately and securely maintain DOE personal records. In order to perform HR functions, the system must be capable of identifying and locating DOE federal employees.

18. **What kinds of information are collected as a function of the monitoring of individuals?**
   - Names, addresses, DOB, Social Security Numbers, gender, race/ethnicity info, disabilities, veteran's info, and education.
   - For security purposes system audit logs are maintained to record system activity and user activity. This activity includes invalid logon attempts and access and modification to data in the system.

19. **Are controls implemented to prevent unauthorized monitoring of individuals?**
   - CHRIS has established policies and procedures for controlling and monitoring access to the system. These are defined in “Security Plan for the Corporate Human Resources Information System (CHRIS) Human Resources Management System (HRMS)”, May 2007.

### 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.**
   - Data in the CHRIS system concerning DOE federal employees goes through workflow approval processes to ensure accuracy, completeness, and appropriate management approvals.

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 and data are maintained at a single site; however, DOE employees from across the Department who are responsible for the management and operation of the system may access the system via the DOE Network or Virtual Private Network (VPN) connection. These employees are trained to ensure the consistent use of this system across the DOE complex. Furthermore, an online User’s Manual is provided and system help desk is provided to assist system users.

### Retention & Disposition

22. **What are the retention periods of data in the information system?**
   - Data retention for DOE employee records stored in this system is conducted in accordance with DOE Administrative Records Schedule 1: Personnel Records. (See [http://cio.doe.gov/RBManagement/Records/PDF/RS-DOEADM01.PDF](http://cio.doe.gov/RBManagement/Records/PDF/RS-DOEADM01.PDF)).
# Module II – PII Systems & Projects

## 23. What are the procedures for disposition of the data at the end of the retention period?

The procedures for disposition of data in the system for DOE employees records are defined in DOE Administrative Records Schedule 1: Personnel Records. (See http://cio.doe.gov/RBManagement/Records/PDF/RS-DOEADM01.PDF).

## Access, Safeguards & Security

### 24. What controls are in place to protect the data from unauthorized access, modification or use?

Access to CHRIS information is limited to authorized users who are authenticated into the DOE network and then to MIS Gateway. In addition, access is role based and users can only access information they are authorized to see.

- SSP updated: 3-11-2010
- ATO: 5-21-2007

### 25. Who will have access to PII data?

System Administrators, HR Project Administrators, HR users, and Personnel Offices

### 26. How is access to PII data determined?

Authorized DOE HR staff is provided access based on role and responsibility in order to perform required HR functions and activities. System Administrators and help desk staff has access to all data in the system in order to maintain the system and assist users with issues and problems.

### 27. Do other information systems share data or have access to the data in the system? If yes, explain.

Yes, the CHRIS system interfaces with OPM and the following DOE systems:
- **ESS** – provides CHRIS system Thrift Savings Plan data, education, competency, emergency contact, disability, and ethnic origin information.
- **DOEInfo** – provides CHRIS system email, home address, LWOP data and receives Thrift Savings Plan data, education, competency, emergency contact, disability, and ethnic origin information from CHRIS.
- **STARS** – receives training accounting data from CHRIS system
- **OPM** – receives CPDF and Benefit information from CHRIS system
## MODULE II – PII SYSTEMS & PROJECTS

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
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<tbody>
<tr>
<td>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?</td>
<td>Yes. Interconnection Security Agreements are in place and operating for all systems that interface with CHRIS.</td>
</tr>
<tr>
<td>29. Who is responsible for ensuring the authorized use of personal information?</td>
<td>System owner</td>
</tr>
<tr>
<td>Role</td>
<td>Signature</td>
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<tr>
<td>----------------------------------</td>
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<tr>
<td>Chief Privacy Officer</td>
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<tr>
<td>Ingrid Kolb</td>
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<tr>
<td>Senior Agency Official for Privacy (SAOP)</td>
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