

Privacy Impact Assessment
Office of Commercialization and Project Management

A. Contact Information

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Note: The Golden Field Office is going to a new electronic procurement system (STRIPES) in March. The owner is Doug Baptist at HQ DOE. In the interim, the Procurement Management Database owner is Roselle Drahusak-Crow at the Department of Energy Golden Field Office

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B. SYSTEM APPLICATION/GENERAL INFORMATION

1. **Does this system contain any information about the individual?**
 - a. **Is this information identifiable to the individual?**
Yes – The PMD system provides information regarding the contract awards, addresses, DUNS numbers, TINs, name of awardee, name of company, etc.

 - b. **Is this information about individual members of the public?** ✓
Yes – it can be. Same answer as 1 a above. In addition, sometimes the contract files contain information about key contractor personnel such as their resumes, phone numbers, etc.

 - c. **Is the information about DOE or contractor employees?**
Yes – sometimes the contract files contain information about key contractor personnel, such as their resumes, Duns, TINs, etc. Names of Project Officers and their office phones are also listed on the contract files.

2. What is the purpose of the system/application?

The purpose of the system is to maintain a record for all contractual and financial assistance awards issued out of the Department of Energy Golden Field Office. It also tracks participants in merit review committees, purchase requests, funding, and other award information such as the Project Officer.

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

Energy Policy Act of 2005.

C. DATA IN THE SYSTEM

1. What categories of individuals are covered in the system?

Individuals covered in the system are contracting officers, executives of the companies receiving awards, contractor project managers, government technical points of contact and merit review committee members.

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? Information is taken from the applications/proposals submitted by the recipients/contractors. Data checks can come from Dun and Bradstreet, CCR, past performance references, etc. Recipients and Contractors are advised in the solicitation and the contract to identify protected data.

b. What Federal agencies are providing data for use in the system? Other federal agencies include all federal contracting agencies as necessary for the particular circumstance, and the U.S. Treasury Dept.

c. What tribal, state, and local agencies are providing data for use in the system? Tribal governments provide the information in their application and request for proposals.

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

Data can be collected on past performance, Dun and Bradstreet, and CCR.

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

Contact information is collected about individuals (in applications and/or resumes) including name, address, email, phone numbers, DUNS Number, Tax ID number, education, employment history, and financial information.

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOE records be verified for accuracy? Data collected will be verified through systems already in place or by phone, email or written correspondence as submitted by the recipient/contractor wishing to receive an award.

b. How will data be checked for completeness? Data is checked for completeness through compliance review checks and checks and balances built into the systems used. (i.e., CCR).

c. Is the data current? What steps or procedures are taken to ensure the data are current and not out of date? Data has to be verified for accuracy, completeness and current, by the Contracting Officer before an award can be made.

- d. **Are the data elements described in detail and documented?** The data collected is maintained in the official contract file.

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?** The data are both relevant and necessary to the purpose for which the system is designed as these are legal documents and have to be in compliance with the Federal Acquisition Regulations 41 USC and other statutory requirements.
- 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?** The system will maintain data until the award is completed and closed out. It is then sent to a repository and destroyed after the destroy-date annotated on the file.
- 3) **Will the new data be placed in the individual's record?** If the contractor changes company names or has new program managers assigned, a contract modification will be issued through the same systems identified above and will become part of the official contract file.
- 4) **Can the system make determination about employees/the public that would not be possible without the new data?** NA
- 5) **How will the new data be verified for relevance and accuracy?** Refer to Sections d, 1 & 3 above.
- 6) **If the data are being consolidated, what controls are in place to protect the data from unauthorized access or use?** Controls are in place that only allows certain individuals with need to know (i.e., Contracting Officers or Project Officers) access to the information.
- 7) **If the processes are being consolidated, do the proper controls remain in place to protect the data and prevent unauthorized access?** As stated above there are control access requirements that limit the number of individual to that data. Contract files are maintained throughout the life of the contract including the modifications in the contract file.
- 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.** Retrieved by IIPS tracking number, award number, or award recipient name.
- 9) **What kind of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?** By the Project Management Database, including individual's contact information. They are used to help manage Financial Assistance Awards and merit review committees. Authorized DOE and contractor employees have access to these reports.
- 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)?** An individual's participation in DOE programs is voluntary. If information is marked sensitive, it is treated as such and not disclosed to those not having a need to know.

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?** The system is operated in only one site managed through DOE.
- 2) **What are the retention periods of data in the system?** The retention period depends on the data, length of contract, contract litigation issues, 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?** According to RARM schedules 3.14 & 3.14.1; 6 years & 3 months after closeout the files are identified, issued a tracking number in the data system and boxed and sent to the retention area with disposition instructions. Prior to the file being sent to disposition, a checklist is signed off by the government personnel insuring the file is current and the disposition date is accurate. Procedures are documented in the Standard Operating Procedures and in accordance with the Federal Acquisition Regulations part 4. With the new STRIPES system, this will be handled through the system as designed by HQ DOE.
- 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?** The system does not affect public or employee privacy as a contract belongs to the public. There are certain types of information that is not released to the public based on proprietary data, source selection sensitive information, and exemptions under FOIA.
- 6) **Will this system provide the capability to identify, locate, and monitor individuals?** The system will identify the contractor/recipient address but is not used to monitor the individuals.
- 7) **What kinds of information are collected as a function of the monitoring of individuals?** None – See 6 above.
- 8) **What controls will be used to prevent unauthorized monitoring?** N/A
- ✓ 9) **Under which PA system of records notice does the system operate?** NA.
- 10) **If the system is being modified, will the PA system of records notice require amendment or revision?** N/A.

F. Access to Data

- 1) **Who will have access to the data in the system?** Authorized DOE and contractor employees have access to the system/network on a need to know basis.
- 2) **How is access to the data by a user determined?** Access to data is determined based on job function and/or organization.
- 3) **Will users have access to all data on the system or will the user's access be restricted?** User's access on the system is restricted by the individual's need to know basis and password protected.
- 4) **What controls are in place to prevent the misuse (e.g., unauthorized access only and restricted locked areas)?** Systems are in place with password access only and restricted locked areas.
- 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 PA contract clauses included in their contracts and other regulatory measures addressed?** Contractors are involved with the design, development, and maintenance of the database system and are required to sign a non-disclosure agreement.
- 6) **Do other systems share data or have access to the data in the system?** Other Data systems overlay into the system such as the CCR, PADS, FPDS-NG, STARS, etc. They too are protected through a secure password access and need to know.
- 7) **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?** All employees having access rights to the system have a responsibility to protect the data from release.
- 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

PIA Approval Signatures

Original copy signed and on file with the DOE Privacy Office.