

PRIVACY IMPACT ASSESSMENT: ORG NAME – SYSTEM NAME PIA Template Version 1 – August, 2010

> Department of Energy Privacy Impact Assessment (PIA)



THIRD PARTY WEBSITE OR APPLICATION

Guidance is provided in the template. See DOE Order 206.1, Department of Energy Privacy Program, Appendix A, Privacy Impact Assessments, additional guidance for conducting a PIA: <u>http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf</u>

Please complete electronically: no hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT		
Date	August 06, 2010	
Departmental Element & Site	The URL, for DOE & Public OpenGov participants, is <u>http://opengov.doe.gov/login</u> - until August 27 the URL will point to the test system, which is an exact duplicate of the production system.	
Name of Project	OpenGov UserVoice System	
Exhibit Project UID	Not applicable – the service will be used initially for three months via a subscription from the vendor.	
New PIA X Update	This is a new PIA.	
	Name, Title	Contact Information Phone, Email
System Owner	TheAnne Gordon, Associate CIO for IT Planning, Architecture, and e-Government (IM- 20)	(202) 586-3705, TheAnne.Gordon@hq.doe.gov
Local Privacy Act Officer	Jerry Hanley	(202) 586-0483 Jerry Hanley@hq.doe.gov





MODULE I – PRIVACY NEEDS ASSESSMENT		
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Patricia McMahon	(202) 586-6620 Patty.Mcmahon@hq.doe.gov
Person Completing this Document	Denise Hill Senior Technical Advisor Office of the CIO IT Planning, Architecture, and e-Government (IM-20)	(202) 586-5848 Denise.Hill@hq.doe.gov
Purpose for using the Third-Party Website or Application	The "DOE OpenGov Plan Implementation Process" is the essential next step for the Department in its ongoing efforts to fulfill the President's Open Government Initiative and meet the guidance and requirements of OMB with respect to executing that Initiative. This implementation phase involves engaging the American public as well as DOE employees and contractors much more extensively to solicit from them their ideas, suggestions, comments, corrections and priorities with respect to the DOE plans for greater Transparency, Participation, and Collaboration. As a result, this utilization of UserVoice has been selected as a key tool to accomplish this. Accordingly, it will need to be extended to both the public-at -large as well as to all DOE personnel including the National Labs and other non-"doe.gov" DOE email addresses in order to reach all agency personnel. To solicit department-wide and full public participation in the "DOE OpenGov Plan Implementation Process", a crowd sourcing initiative is scheduled to begin on August 27th. A key benefit for the Department as a whole as well as significantly assisting in fulfilling part of the "DOE OpenGov Plan Implementation Process" by increasing the opportunities for greater Participation and Collaboration through UserVoice is that all participants, both DOE personnel and members of the American public, will be able to review and comment on everyone's ideas collectively, and vote on those that they deem most important.	
Type of Information Collected or Maintained by the Third Party Website or application :	 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. finger print, retinal scan 	





MODULE I – PRIVACY NEEDS ASSESSMENT		
	Mother's Maiden Name	
	DoB, Place of Birth	
	Employment Information	
	Criminal History	
	Name, Phone, Email Address The site colle purposes of responding to comments.	cts name and email address for
	Other – Please Specify	
Has the third-party website or application privacy policy been reviewed to evaluate risks and determine whether the website is appropriate for use? Will the third-party website policy be monitored to detect changes?		YES, review was conducted
Has the appropriate DOE branding been applied to the third party website or application?		YES, The DOE Logo will be used to brand the site.
Threshold Questic	ons	Contraction of the second
1. Will the third party website contain (collect and/or maintain), or plan to contain any information about individuals?		YES (see above)
2. Is the information in	identifiable form?	YES
3. Is the information about individual Members of the Public?		YES
4. Is the information about DOE or contractor employees?		YES
		 Federal Employees Contractor Employees
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.		
Module II must be completed for use of third party websites 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





MODULE II – PII SYSTEMS & PROJECTS

DATA SOURCES

8. What are the sources of information about individuals in the project?	The individual participant, should they choose to participate, will provide their email address of their choosing, and if they choose, will provide their given name or a pseudonym.	
9. Will the information system derive new or meta data about an individual from the information collected?	No. Only the ideas, ranked by vote count, will be utilized once the participation in the system has been stopped. There will not be any direct attribution to any specific individual. All data will be deleted once the ideas, by vote count, are listed.	
10. Are the data elements described in detail and documented?	Not applicable	
DATA USE		
11. How will the PII be used?	The Department will not utilize any PII. Names and email addresses will be utilized for registration/login programmatically by the system in order to validate that a member of the public (as opposed to computer generated comments) are submitting ideas and or comments.	
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?	The system is designed to allow participants the opportunity to provide ideas, suggestions, comments, corrections and priorities to the Department regarding recommendations and solutions for the "DOE OpenGov Plan Implementation Process". The participant (or other participants) may provide comments about the submitted ideas, suggestions, comments, corrections and priorities for other participants to review. Participants are also able to vote on their preferred ideas, suggestions, comments, corrections and priorities. It is only the list of ideas, suggestions, comments, corrections and priorities, listed by vote count, without any attribution to any individual that will be utilized for inclusion in the "DOE OpenGov Plan Implementation Process".	
13. With what other agencies or entities will an individual's information be shared?	None	
Reports		





MODULE II – PII SYSTEMS & PROJECTS		
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?	Not applicable	
16. Who will have access to these reports?	Not applicable	
Monitoring		
17. Will the website or application provide the capability to identify, locate, and monitor individuals?	Νο	
18. What kinds of information are collected as a function of the monitoring of individuals?	None	
19. Are controls implemented to prevent unauthorized monitoring of individuals?	Not applicable	
DATA MANAGEMENT & MAINTE	NANCE	
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.	If the participant chooses to provide ideas or vote on ideas, suggestions, comments, corrections and priorities provided by other participants, they must provide their an email address of their choice to register to use the system. The system will send the participant a confirmation email address, requiring them to validate that they have requested to participate in the initiative. The system subscription expires on December 31, 2010, at which time all of the collected ideas and registration/login credentials will be deleted. There will not be any need for data to be kept current.	
21. If multiple sites are used in the project, how will consistent use of the information be ensured at all sites?	N/A One Site	
Retention & Disposition		





MODULE II – PII SYSTEMS & PROJECTS		
22. What are the retention periods of data collected by the third party website or application?	Retention through the life of the Open Government Directive and Program.	
23. What are the procedures for disposition of the data at the end of the retention period?	Disposition is the information will be archived to the network drive.	
ACCESS, SAFEGUARDS & SECURITY		
24. What controls are in place to protect the data from unauthorized access, modification or use?	DOE will collect ideas. The collection of email addresses and, in some cases real names is to validate that a member of the public (as opposed to computer generated comments) are submitting ideas and or comments. The email addresses are protected from in accordance with the Terms of Service Agreement and Privacy Policy.	
25. Who will have access to PII data?	Access is controlled by access rights and limited to the system staff.	
26. How is access to PII data determined?	Access is controlled by the administrator of the system which is the DOE Open Government coordinator.	
27. Will the third-party website provider notify DOE if the site is compromised in any manner that might affect the protection of PII?	YES, review was conducted	
28. Are privacy safeguards and security addressed in the Terms of Service Agreement?	YES, review was conducted.	
29. Who is responsible for ensuring the authorized use of personal information?	The DOE Open Government coordinator	
END OF MODULE II		



