

PRIVACY IMPACT ASSESSMENT: EERE – Information Center Contact

Template - January 30, 2009, Version 2



Department of Energy
Privacy Impact Assessment (PIA)

Affects Members Of the Public?	YES
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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 electronically: no hand-written submissions will be accepted.

Module I – Privacy Needs Assessment

Date	April 10, 2009	
Departmental Element & Site	Energy Efficiency & Renewable Energy (EERE) Site - DOE Headquarters, Forrestal	
Name of Information System or IT Project	EERE Information Center Contact	
Exhibit Project UID	Contract Number: DE-AM01-06IM00054 Office of EERE Master Task Order: DE-AT01-061EE11224 7EE08 EERE Information Center Operations and Support	
	Name, Title	Contact Information Phone, Email
System Owner	Scott Gregory Minos, Energy Technology Program Specialist	(202)586-2097 scott.minos@ee.doe.gov
Privacy Act Officer	Jerry Hanley Chief Privacy Officer, U.S. Department of Energy	(202) 287-1563 Jerry.Hanley@hq.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Phil Knopp Office of Corporate Information Systems, CF-40 Germantown, U.S. Department of Energy	(301) 903-0364 Phil.Knopp@hq.doe.gov

Module I – Privacy Needs Assessment

Person Completing this Document	Alexander Clayborne	(301)903-8819
Purpose of Information System or IT Project	The EERE Information Center Contact form allows EERE to provide answers to questions related to energy efficiency and renewable energy and DOE publications to requesters.	
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 checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify	
Has there been any attempt to verify Information about an Individual in Identifiable Form does not exist on the system? <i>OMB 03-22 defines Information in identifiable form as information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).</i>	NO	
If "Yes," what method was used to verify the system did not contain Information in Identifiable Form? (e.g. system scan)		

Threshold Questions

Module I – Privacy Needs Assessment

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

If the answer to the **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.

For information systems that collect, maintain or disseminate information in identifiable form from or about members of the public, please complete Modules II and III. 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. This template may not be modified. 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 (and III if necessary).

Module II – System Information for All Systems

Module II – System Information for All Systems

<p>1. What categories of individuals are collected or maintained by the information system?</p>	<p><input type="checkbox"/> Federal Employees</p> <p><input type="checkbox"/> Contractor Employees</p> <p><input checked="" type="checkbox"/> Members of the Public Individuals in non-employee or contractor context. This includes individuals for whom DOE maintains information, as required by law, who were previously employed or contracted by DOE.</p> <p><input type="checkbox"/> Other, Please Specify</p>
<p>2. What is the source(s) of information about individuals in the information system?</p>	<p>Individual-provided</p>
<p>3. With what other agencies or entities will an individual's information be shared? How will the information be used?</p>	<p>Washington State University (WSU)</p> <p>Washington State University is a trusted contractor for the DOE EERE. The information is used by WSU to empower them to respond to public inquiries and provide publically available information about EERE program areas to the requesting public on behalf of EERE.</p>
<p>4. Is the use of the information in identifiable form both relevant and necessary for the mission of the organization and DOE?</p>	<p>Yes, the information is used to fulfill the EERE mission to supply publically available Energy Efficiency and Renewable Energy information and publications to the public.</p>
<p>5. Are the data elements described in detail and documented?</p>	<p>Yes—see for example CMD fields.doc</p>

REPORTS

<p>6. What kinds of reports are produced about individuals or that contain an individual's data?</p>	<p>Only ad-hoc requests from DOE when follow-up to individuals from DOE staff is expected, requested or required</p>
<p>7. What will be the use of these reports?</p>	<p>DOE staff make personal follow-up to customers who contacted the EERE Information Center</p>
<p>8. Who will have access to these reports?</p>	<p>WSU staff preparing reports; and individual DOE staff for whom the data is intended.</p>

MAINTENANCE

Module II – System Information for All Systems

<p>9. If the information system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?</p>	<p>The system is operated in only one site.</p>
<p>10. What are the retention periods of data in the information system?</p>	<p>Indefinite</p>
<p>11. What are the procedures for disposition of the data at the end of the retention period?</p>	<p>All data is maintained indefinitely.</p>
<p>12. How does the use of this information system affect privacy? Consider also the use of emerging technologies and how those technologies may impact privacy.</p>	<p>Note that customers may opt out of either (1) sharing any name/address data with EERE Information Center or (2) having that data shared with DOE. Furthermore, when mailing information to customers, they may request that mailing information be subsequently deleted.</p>
<p>ACCESS</p>	
<p>13. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>See Security plan. Also, as a contractor WSU limits internal access to activities related to that contract.</p>
<p>14. If processes are being consolidated, do the proper controls remain in place to protect the data and prevent unauthorized access?</p>	<p>This system is not in transition.</p>
<p>15. Who will have access to this information system and its data (all data)? Will other agencies share data or have access to the data in this system? How will the data be used by the other agency?</p>	<p>No other agencies will have access to this data. Washington State University Information Center staff will have access to the data in order to perform their job function.</p>
<p>16. Who will have access to information in identifiable form or and PII?</p>	<p>Washington State University Information Center staff will have access to the data in order to perform their job function.</p>

Module II – System Information for All Systems

<p>17. How is access to the data determined?</p>	<p>Only users with a business reason to access the data will have access.</p>
<p>18. 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?</p>	<p>Yes, there is a non-disclosure form.</p>
<p>19. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>In order to provide mailing services to the public information may be provided to the EERE Publication and Product Library also operated by the EERE Information Center.</p>
<p>20. For connecting information systems, is there an ISA other agreement between System Owners to ensure the privacy of individuals is protected?</p>	<p>No</p>
<p>21. Who is responsible for assuring proper use of the information system's information in identifiable form?</p>	<p>Project Manager (Lee Link, PhD) (360)956-2182</p>

Module III – Systems with Information About Members of the Public

<p>1. What legal authority authorizes the purchase, development or maintenance of this information system?</p>	<p>American Recovery and Reinvestment Act of 2009</p>
<p>2. Has a Privacy Act System of Records Notice been published in the Federal Register? If "Yes," provide name of SORN and location in the Federal Register.</p>	<p>No</p>
<p>3. If the information system is being modified, will the SORN require amendment or revision?</p>	<p>No</p>
<p>4. How will data collected from sources other than DOE records be verified for accuracy, relevance and completeness?</p>	<p>Data is not collected from any other sources.</p>
<p>5. Are records in the system about individuals current? What steps or procedures are taken to ensure the data is current?</p>	<p>The data may be used to contact the individual. If contact is necessary, data updated for accuracy purposes at that time.</p>
<p>6. Will the information system derive new or meta data about an individual through aggregation from the information collected? How will this be maintained, including verified for relevance completeness, and accuracy?</p>	<p>No</p>
<p>7. Will the new or meta data be part of an individual's record?</p>	<p>No new or meta-data is derived.</p>
<p>8. How will the new or meta data be used? Will it be used to make determinations about members of the public?</p>	<p>No</p>

Module III – Systems with Information About Members of the Public

<p>9. How will the 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.</p>	<p>Records are retrieved by name</p>
<p>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)?</p>	<p>Since the publications or information being requested is usually provided directly to the individual, enough information must be provided in order to carry out that function. All information is provided on a voluntary basis.</p> <p>Note that customers may opt out of either (1) sharing any name/address data with EERE Information Center or (2) having that data shared with DOE. Furthermore, when mailing information to customers, they may request that mailing information be subsequently deleted.</p> <p>The EERE Security & Privacy policy is accessible from the data collection form.</p>
<p>11. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No</p>
<p>12. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>N/A</p>
<p>13. What controls will be used to prevent unauthorized monitoring?</p>	<p>System does not have the capability to monitor.</p>

SIGNATURE PAGE

	Signature	Date
PIA Approval Signatures	Original Copy Signed and On File with the DOE Privacy Office	