Section I

Department of Energy
Privacy Impact Assessment (PIA)

Name of Project: Electronic Document Management System
Bureau: Department of Energy
Project’s Unique ID: EDMS
Date: August 6, 2008

A. CONTACT INFORMATION:

1) Who is the person completing this document?
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2) Who is the system owner?
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3) Who is the system manager for this system or application?
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4) Who is the IT Security Manager who reviewed this document?
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5) Who is the Privacy Act Officer who reviewed this document?
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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals? Yes
   
a. Is this information identifiable to the individual? Yes
   
b. Is the information about individual members of the public? Yes
   
c. Is the information about DOE or contractor employees? Yes

2) What is the purpose of the system/application?
The EDMS (Documentum) supports the creation, revision, assembly, tracking, and record retention of electronic and hardcopy versions of Bechtel Jacobs documents. EDMS meets DOE-specific records management requirements and addresses document tracking, dual storage, standard and controlled distribution, and CERCLA requirements related to the Administrative Record. The EDMS, thus, captures all correspondence from the DOE, EPA and TDEC, and electronically distributes those to the appropriate BJC manager. Also, the system is used to house and track information related to Energy Employees Occupational Illness Compensation Program (EEOICPA) litigation requests and responses.

3) What legal authority authorizes the purchase or development of this system/application?
   Department of Energy

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?
   Contractor and former contractor (public)

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?
   Some data comes directly from individuals and some information comes from other applications within the boundary. The EEIOCPA documentation is scanned and loaded into the system from both the BJC active and inactive records inventory.
   
b. What Federal agencies are providing data for use in the system?
   None
   
c. What Tribal, State and local agencies are providing data for use in the system?
d. From what other third party sources will data be collected? None

c. What information will be collected from the individual and the public? This application collects (from employees) the following: this application holds the personnel and employment records for all individuals who have made a EEOICPA claim. These records can include all medical, payroll, human resources, employment verification, employment history, accident and occurrence records.

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOE records be verified for accuracy? BJC functional legal or records management personnel have processes in place to ensure accuracy of the data.

b. How will data be checked for completeness? BJC applications require a complete set of data for processing purposes and information is not transmitted to DOE or any other agency until the full set of records have been added into the system. Procedures and processes are in place to ensure the completeness of the data.

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? BJC legal or records management personnel have processes and procedures in place to ensure the accuracy of the data.

d. Are the data elements described in detail and documented? This information is described in the Legacy Document Desktop Work Instructions.

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? Yes

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? No

3) Will the new data be placed in the individual's record? N/A
4) Can the system make determinations about employees/public that would not be possible without the new data? N/A

5) How will the new data be verified for relevance and accuracy? N/A

6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use? N/A

7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? N/A

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.
The data is stored in the system under the person’s social security number.

9) What kinds of reports can be produced on individuals?
Numerous business-related reports are available with information about individuals (employees and subcontractors).

What will be the use of these reports?
Reports are used for the business of the BJC BJC EEOICPA litigation process.

Who will have access to them?
Reports are available the records management and legal functional staff as needed to perform their job.

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)? None.

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 applications do not cross Accreditation Boundaries.

2) What are the retention periods of data in the system?
The retention period is considered as indefinite on the EEOICPA records meaning the needed for retention of this information is re-evaluated periodically.
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? Where are the procedures documented?

Disposition of the data for the BJC D&D Contract will occur at the end of the contract. At that time, data will be turned over to DOE or designated Contractor. Data will be archived or deleted at the end of the contract based on DOE guidelines for retaining records. Currently the retention period is considered as indefinite on the EEOICPA records meaning the needed for retention of this information is re-evaluated periodically.

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? N/A

6) Will this system provide the capability to identify, locate, and monitor individuals? No.

7) What kinds of information are collected as a function of the monitoring of individuals? N/A

8) What controls will be used to prevent unauthorized monitoring?

No monitoring is possible outside of normal applications usage.

9) Under which Privacy Act system of records notice does the system operate? N/A

10) If the system is being modified, will the Privacy Act 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?
Access to data is controlled by the applications administrators for each application and the legal and records management staff that have a need-to-know with this information have the appropriate access to the system and records.

2) How is access to the data by a user determined?
Access to data is approved by the application owners and granted by the application administrator on a need-to-know basis.

3) Will users have access to all data on the system or will the user’s access be restricted?
User access is controlled by the system administrators by granting roles to individuals. Roles are restricted to see only the functionality/data required by that role.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**
Application owners enforce separation of responsibilities to only allow access to functionality/data necessary to perform job functions.

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 Privacy Act contract clauses included in their contracts and other regulatory measures addressed?** Yes, DOE Privacy Act clauses are included.

6) **Do other systems share data or have access to the data in the system? If yes, explain.**
Date is shared between the EDMS system and the Legacy Claims System (LCLAIMS) where the initial request for information is logged and tracked.

7) **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**
Any applications that process Privacy Act data are classified as "Protected" by the BJC Cyber Security Manager. Those applications then document and test the controls necessary to protect the interfaces/data.

8) **Will other agencies share data or have access to the data in this system?**
Data is shared for an individual employee is transmitted from the system when and official request for information is filed in conjunction with an EEOICPA litigation claim. The data is shared to the requesting parties such as DOE, DOL, DOE doctor panel and legal council.

9) **How will the data be used by the other agency?**
The EEOICPA data is used to verify employment history, work location, medical condition, employment history, accident reporting, occurrence reporting, radiological history and exposure history.

10) **Who is responsible for assuring proper use of the data?**
Proper use of the data is the responsibility of the receiving agency.
PIA Approval Signatures

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