

**Department of Energy**  
**Privacy Impact Assessment (PIA)**

**Name of Project: HS Correspondence Tracking System (HSCT)**

**Bureau: Department of Energy**

**Project Unique ID: 019-10-01-14-02-3011-00**

**Date: August 20, 2008**

**A. CONTACT INFORMATION**

**1) Who is the person completing this document?**

Steve Simon, Office of Information Management, Office of Health, Safety and Security, U.S. Department of Energy, HS-1.22, 1000 Independence Ave., S.W., Washington, D.C. 20585, 301-903-5615.

**2) Who is the system owner?**

Cecelia Kenney, Office of Health, Safety and Security, U.S. Department of Energy, HS-1, 1000 Independence Ave., S.W., Washington, D.C. 20585, 202-586-4399

**3) Who is the system manager for this system or application?**

Raymond Holmer, Director, Office of Information Management, Office of Health, Safety and Security, U.S. Department of Energy, HS-1.22, 1000 Independence Ave., S.W., Washington, D.C. 20585, 301-903-7325 will manage this system.

**4) Who is the IT Security Manager who reviewed this document?**

Vinh Le, Office of Information Management, Office of Health, Safety and Security, U.S. Department of Energy, HS-1.22, 1000 Independence Ave., S.W., Washington, D.C. 20585, 303-903-4648

**5) Who is the Privacy Act Officer who reviewed this document?**

Jerry G. Hanley, Chief Privacy Officer, Office of Information Resources, Office of Management, U.S. Department of Energy, MA-90, 1000 Independence Avenue, S.W., Washington, DC 20585, 202-586-0483

**B. SYSTEM APPLICATION/GENERAL INFORMATION**

**1) Does this system contain any information about individuals? Yes**

- a. Is this information identifiable to the individual? <sup>1</sup> 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 purpose of the system is for HSS to track its correspondence actions.

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<sup>1</sup> "Identifiable Form" - According to the OMB Memo M-02-22, this means 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 descriptor).

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

DOE's statutory basis of the HSS programs is set forth in Codes of Federal Regulation. A few examples include 10 CFR Part 820, Procedural Rules for DOE Nuclear Activities, 10 CFR Part 708 Criteria and Procedures for DOE Contractor Employee Protection Program, 10 CFR Part 830 Nuclear Safety Management, and 10 CFR Part 835 Occupational Radiation Protection.

**C. DATA IN THE SYSTEM**

**1) What categories of individuals are covered in the system?**

All categories of individuals are potentially covered in the system.

**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?**

Both. An individual might provide his/her privacy information in a correspondence for identification purposes. Or a representative of an organization might provide privacy information.

**b. What Federal agencies are providing data for use in the system?**

Any Federal Agency including Congress can submit to HSS a correspondence item that contains personal privacy information for identification purposes.

**c. What tribal, state, and local agencies are providing data for use in the system?**

Any Tribal, State or local agencies that have a DOE site within their jurisdiction can submit to HSS a correspondence item that contains personal privacy information for identification purposes.

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

Members of the public, business community or private organizations can submit to HSS a correspondence item that contains personal privacy information for identification purposes.

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

Typically, users of the system have names, organization codes, work email address, and work phone number, and work fax number stored in the system. A correspondence is tracked as an attachment to an action/task which is assigned to an employee by his/her supervisors. Occasionally, PII may be contained in a correspondence or other type of attachment.

**3) Accuracy, Timeliness, and Reliability**

Legacy data is considered to be accurate and complete.

**a. How will data collected from sources other than DOE records be verified for accuracy?**

N/A, data is not collected from sources other than DOE records.

**b. How will data be checked for completeness?**

The sites and contractors have the ability to view their information. Approved users may submit changes as needed.

**c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?**

The data is current. The current data is maintained on a daily basis in the existing reporting module.

**d. Are the data elements described in detail and documented?**

Yes, they are documented in the system documentation and the data dictionary.

**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. All data are relevant and necessary to tracking of actions which are assigned to employees (users of the HSCT system). No personal identifiable data are required to be tracked by the system.

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, the system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

3) **Will the new data be placed in the individual's record?**

No, the system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

4) **Can the system make determinations about employees/the public that would not be possible without the new data?**

No.

5) **How will the new data be verified for relevance and accuracy?**

Users of the HSCT system verify the data assigned to them for relevancy and accuracy.

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

No. Data are not being consolidated in this system.

7) **If processes are being consolidated, do the proper controls remain in place to protect the data and prevent unauthorized access?**

N/A. Processes are not being consolidated.

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.**

No. Information will not be retrieved by personal information.

9) **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

No reports are produced on individuals. Managers have access to his/her organization work performance information such as overdue action items.

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)?**

No personal information is required by the HSCT system. Any provided information is contained in an attachment and used for HSS correspondence tracking purposes only. Users do not consent to any other uses of this information.

## **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?**

NA, the data is only stored at one location.

**2) What are the retention periods of data in the system?**

NA. All data is to be retained for the life time of the system to provide historical perspectives to completed actions and tracking.

**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?**

NA. HSS will review data as needed to determine whether there is still a valid need to keep the information.

**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?**

NA. The system is not using technologies in that affect public/employee privacy.

**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?**

The system is not and will not be used for monitoring individuals.

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

The system is not and will not be used for monitoring.

**9) Under which Privacy Act system of records notice does the system operate?**

NA. The system does not currently operate under a Systems of Record notice because certain information to be maintained in the system is deemed to be sensitive under Section 208 (b) (1)(C) of the E Government Act of 2002 and not subject to (1)(B) (iii) requirements that the Privacy Impact Assessment be made publicly available through the agency web site, publication in the Federal Register, or other means. In addition, under Section 208 (b)(2)(B)(VII), a system of records is not being created under section 552a of Title 5, USC (commonly referred to as the 'Privacy Act'). Under Section 552 (a) (5) the term "system of records" means a group of any records under the control of any agency from which information is retrieved by the name of the individual or some identifying number, symbol or other identifying particular assigned to the individual." Finally, the purpose of the system is to facilitate requirements of the Price-Anderson Act. This system will not retrieve information by the name of the individual or any other identifying number or symbol. This is not a system of records.

**10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision?**

No. The HSCT system does not require personal identifiable information.

**F. ACCESS TO DATA**

**1) Who will have access to the data in the system?**

System Administrators, Database Administrators, Developers, HSS managers and assigned privilege users.

2) **How is access to the data by a user determined?**

User profiles are established and roles are defined for those profiles. Roles determine which users see which data. Criteria, procedures, controls, and responsibilities are documented in the design document.

3) **Will users have access to all data on the system or will the user's access be restricted?**

User's access will be restricted. This will be done by the access controls set when an individual user account is created for the system.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

Profiles/role control will ensure that only the data that should be accessible to that individual will appear on the screen.

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?**

DOE contractors are involved with the design, development and maintenance of the system. Privacy Act contract clauses and other regulatory measures are addressed in their contracts.

6) **Do other systems share data or have access to the data in the system? If yes, explain.**

No.

7) **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

NA. The system does not share data with another system. There is no interface to be responsible for.

8) **Will other agencies share data or have access to the data in this system?**

No. The system is strictly for use by HSS.

9) **How will the data be used by the other agency?**

NA. Data is not shared with other agencies.

10) **Who is responsible for assuring proper use of the data?**

NA. Data is not shared with other agencies

**PIA Approval Signatures**

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