

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

Name of Project: ICOMPLAINTS
Bureau: GOLDEN FIELD OFFICE/DEPARTMENT OF ENERGY
Project Unique ID:
Date: 11/19/08

A. CONTACT INFORMATION

1. Who is the person completing this document?

RICKY NEWTON, MANAGER, CIVIL RIGHTS AND DIVERSITY, GOLDEN FIELD OFFICE

2. Who is the system owner?

OFFICE OF CIVIL RIGHTS, HEADQUARTERS

3. Who is the system manager for this system or application?

OFFICE OF CIVIL RIGHTS, HEADQUARTERS

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

TIM PORTER, INFORMATION SECURITY (ISSO)

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

ANNA MARTINEZ-BARNISH

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?

DOE/OCR IS RESPONSIBLE FOR INVESTIGATING AND TRACKING EQUAL EMPLOYMENT OPPORTUNITY (EEO) DISCRIMINATION COMPLAINTS. DOE USES A WEB-ENABLED SYSTEM, ICOMPLAINTS. ICOMPLAINTS USES BOTH PIA AND NON-PIA DATA TO RECORD, TRACK, AND REPORT ON EEO COMPLAINTS AGAINST DOE. IT TRACKS AND INVESTIGATES BOTH INFORMAL AND FORMAL COMPLAINTS.

1 "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?

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, MANAGEMENT DIRECTIVE-110 (EEOC MD-110), 29 CFR 1614, EEOC FORM 462, NO FEAR ACT

C. DATA IN THE SYSTEM

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

INFORMAL AND FORMAL EEO DISCRIMINATION COMPLAINTS

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?

ICOMPLAINTS PIA IS RECEIVED THROUGH AN INITIAL INTERVIEW WITH AN EEO COUNSELOR OR INVESTIGATOR, EITHER FROM THE INDIVIDUAL DIRECTLY OR THROUGH THE INTERVIEW ABOUT ANOTHER INDIVIDUAL INVOLVED IN THE CASE.

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

N/A

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

N/A

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

FROM THE INDIVIDUAL DIRECTLY OR THROUGH THE INTERVIEW ABOUT ANOTHER INDIVIDUAL INVOLVED IN THE CASE

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

NAME, AND LAST FOUR DIGITS OF A FILER'S SOCIAL SECURITY NUMBER, AND POSTAL ADDRESS. IT MAY INCLUDE THE EMAIL ADDRESS, PHONE NUMBER, AND ATTACHED LEGAL DOCUMENTS

3. Accuracy, Timeliness, and Reliability

ICOMPLAINTS PIA IS RECEIVED THROUGH AN INITIAL INTERVIEW WITH A COUNSELOR OR INVESTIGATOR, EITHER FROM THE INDIVIDUAL DIRECTLY OR THROUGH THE INTERVIEW ABOUT ANOTHER INDIVIDUAL INVOLVED IN THE CASE. DESIGNATED DOE ICOMPLAINTS STAFF MEMBERS ENTER DATA INTO THE SYSTEM AND ARE RESPONSIBLE FOR THE ACCURACY OF THE DATA. AN INDIVIDUAL MAY CONTACT HIS OR HER COUNSELOR OR INVESTIGATOR TO REVIEW HIS OR HER PERSONAL DATA AND REQUEST CHANGES, AS APPROPRIATE

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

N/A

b. How will data be checked for completeness?

N/A

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

N/A

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

N/A

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?

YES, MAINTAINED AND FILED THROUGH THE ICOMPLAINT SYSTEM.

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

YES

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?

BY COMPLAINANT

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

AUTHORIZED ACCESS BY USERS WITH NEED TO KNOW AND PASSWORD.

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

YES. DATA IS ACCESSED BY AUTHORIZED PERSONNEL ONLY AND IS STORED IN ENCRYPTED DATABASE.

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.

DATA CAN BE RETRIEVED BY NAME, LAST FOUR DIGITS OF SOCIAL SECURITY NUMBER, PHONE NUMBER, EMAIL ADDRESS AND POSTAL ADDRESS

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

OPEN COMPLAINTS, STATUS REPORTS, TRACKING INFORMATION.
ACCESSED BY AUTHORIZED PERSONNEL WITH PASSWORD

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)?

N/A

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?

OFFICE OF CIVIL RIGHTS-HQ

2. What are the retention periods of data in the system?

ELECTRONIC MASTER FILES AND DATABASES CREATED TO SUPPLEMENT OR REPLACE THE RECORDS COVERED BY A SUBITEM ARE NOT AUTHORIZED FOR DISPOSAL UNDER THE GRS. SUCH FILES MUST BE SCHEDULED ON AN SF 115.

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?

HARD COPIES ARE SHREDDED. SYSTEM DATA IS NOT AUTHORIZED FOR DISPOSAL.

4. Is the system using technologies in ways that DOE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

UNKNOWN

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?

YES

7. What kinds of information are collected as a function of the monitoring of individuals?

SEE SECTION B-2

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

AUTHORIZED ACCESS FOR INDIVIDUALS WITH NEED TO KNOW.
PASSWORD PROTECTED.

9. Under which PIA system of records notice does the system operate?

EEOC MD-110

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 USER WITH NEED TO KNOW.

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

AUTHORIZED USER WITH NEED TO KNOW.

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

RESTRICTED

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

PASSWORD PROTECTED

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 PIA contract clauses included in their contracts and other regulatory measures addressed?

N/A

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

NA

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

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

N/A

9. How will the data be used by the other agency?

N/A

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

OFFICE OF CIVIL RIGHTS-HQ

PIA Approval Signatures

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