Department of Energy
Privacy Impact Assessment (PIA)

Name of Project: Electronic Document Online Correspondence and Concurrence System (eDOCS)
Bureau: Department of Energy
Project Unique ID:
Date: December 15, 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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B.   SYSTEM APPLICATION/GENERAL INFORMATION

1.   Does this system contain any information about individuals?

a. **Is this information identifiable to the individual? [1]**

Yes.

b. **Is the information about individual members of the public?**

Yes, the system contains information about members of the general public who submit Freedom of Information Act (FOIA) and Privacy Act (PA) requests or correspond with DOE officials, members of Congress, the White House, and other federal, state and local agencies; and members of DOE Advisory Committees.

c. **Is the information about DOE or contractor employees?**

Yes. The *CFO Cabinet* portion of eDOCS has information about DOE employees.

2. What is the purpose of the system/application?

The primary purpose of eDOCS is to serve as a tool to manage and control 1) correspondence to and from the Secretary of Energy through the Office of the Executive Secretariat (EXECSEC), 2) correspondence to and from Freedom of Information Act (FOIA) and Privacy Act (PA) requesters, and 3) information about members of DOE Advisory Committees. Correspondence may be received and sent to members of Congress, the White House, Federal government agencies, State and Local government agencies, other DOE program offices, and the general public. This correspondence may include personal information in an "identifiable form" from members of the public.

eDOCS provides an efficient electronic document management system and a workflow process that ensures that correspondence is addressed in a timely manner. The system also provides a records-management system that stores records in accordance with mandated retention periods.

eDOCS is also used to store DOE employee records and changes to their records, which may contain personal information in an "identifiable form." The records are passively archived in the system and read-access is allowed only to authorized individuals.

The system provides DOE with a state-of-the-art tool that promotes the streamlining of procedures to process external and internal correspondence. Additionally, it aids in the tracking of correspondence to efficiently manage the workload among the correspondence processors within the Department; provides enterprise-wide access to documents and records in a manner that is consistent with current technology; meets the expectations for advanced technology from DOE's diverse customers; capitalizes on technology for better

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[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).

full-text and index search and retrieval; ensures that authorized DOE users are able to search and access electronic documents and records; and provides defined and ad hoc workflow capabilities to automate required reviews, approvals, and routing actions.

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

    Department of Energy Authorization Act, Title 42, United States Code (U.S.C), Section 7101 et. seq., 50 U.S.C. 2401 et. seq.; Freedom of Information Act, 5 U.S.C. 552; and Privacy Act, 5 U.S.C. 552a.

C.   DATA IN THE SYSTEM

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

The categories include individuals requesting records under the FOIA and PA, members of DOE Advisory Committees, members of Congress, representatives of organizations and other federal, state, and local agencies, and members of the 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?**

    Information is obtained from the individual to whom it pertains.

    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?**

    None.

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

    None.

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

    The following information is collected from the public: name, home and work address, home and work telephone number, personal and work electronic mail address, type of business or organizational affiliation, a description of the records requested, and a description of matters for DOE consideration or resolution.

3. **Accuracy, Timeliness, and Reliability**

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

    eDOCS does not verify the accuracy or completeness of the data related to the general public. The data in the system is provided by the individual to whom it

pertains. Therefore, it is determined that the information is accurate, timely, and complete at the time it is provided.

b.   How will data be checked for completeness?

eDOCS does not verify the accuracy or completeness of the data related to the general public. The data in the system is provided by the individual to whom it pertains. Therefore, it is determined that the information is accurate, timely, and complete at the time it is provided.

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

eDOCS does not verify the accuracy or completeness of the data related to the general public. The data in the system is provided by the individual to whom it pertains. Therefore, it is determined that the information is accurate, timely, and complete at the time it is provided.

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

Data elements are described in the following documentation: *Department of Energy Electronic Correspondence and Concurrence System, Functional Requirements Document*, Rev. 4, March 1, 2005 and *Department of Energy Electronic Correspondence and Concurrence System, Detailed System Design Document*, Rev. 4, March 1, 2005.

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?

All data in the system is relevant and necessary for DOE to perform its required correspondence, FOIA, and PA responsibilities.

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/the public that would not be possible without the new data?

No.

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

N/A.

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

Data are not being consolidated.

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

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.**

Data is retrieved by name of individual or control number.

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.

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)?**

Information submitted by DOE Advisory Committees members is voluntarily provided. The personal information stored in the system about members of the public is required in order for DOE to respond to their requests and to Congressional requests on behalf of constituents. The information is used by DOE for the purpose of maintaining a complete and accurate listing of all Advisory Committee members.

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?**

N/A; eDOCS is operated only at DOE Headquarters.

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

Retention periods are in accordance with National Archives and Records Administration (NARA) and DOE records schedules. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm.

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?**

Procedures for disposition are documented in applicable NARA and DOE records schedules. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm.

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, the system does not have the capability to identify, locate, and monitor individuals.

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?

N/A.

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

✓ The system operates in accordance with the following DOE Systems of Records (SORs):

- DOE-9 Members of DOE Advisory Committees - http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?position=all&page=38769&dbname=2003_register
- DOE-55 Freedom of Information and Privacy Act (FOIA/PA) Requests for Records - http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?position=all&page=38817&dbname=2003_register
- DOE-56 Congressional Constituent Inquiries - http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?position=all&page=38818&dbname=2003_register
- DOE-58 General Correspondence Files of the Secretary, Deputy Secretary and Under Secretary of Energy - http://frwebgate.access.gpo.gov/cgi-bin/getpage.cgi?position=all&page=38820&dbname=2003_register

10.   If the system is being modified, will the PA system of records notice require amendment or revision?

N/A; the system is not being modified. Capabilities relative to the FOIA Reading Room were already in existence in eDOCS so there is no modification.

F. ACCESS TO DATA

1. Who will have access to the data in the system?

DOE federal and contractor personnel will have access to the data in the system. Access to personal data in the system will be strictly controlled based on job responsibility and function.

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

Access to data is determined by evaluation of job responsibilities and organization. Based on the evaluation, the user is assigned permissions that are applied using system access control lists. User accounts are reviewed monthly to identify and remove users who have left the organization or whose duties no longer require access to the system.

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

Access will be restricted by job roles and responsibilities.

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

Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The technical controls include restricted access via user-id and password based on user responsibility and job function. These access controls are defined in Section 4 of the eDOCS system security plan. All system team members (federal and contractor) are required to complete the Department of Energy Headquarters Annual Cyber Security Refresher Briefing as a necessary prerequisite for access to the system. Rules of behavior and consequences for violating the rules are displayed to the user each time the user logs onto the system. Administrative controls include non-disclosure agreements, separation of duties so individuals only have access to the personal information needed to perform duties, and use of system audit logs to monitor access and user activity in the system.

In addition, Documentum Trusted Content Services (TCS) was implemented. TCS provides an extra layer of security and complements the core security features of Documentum Content Server. TCS is deeply embedded within the server and includes Repository Encryption, Electronic Signatures, Multi-dimensional access control (MAC), and Digital Shredding. eDOCS OPM is taking advantage of the repository encryption features. Repository encryption is being applied to the file stores (where content is stored) and uses the 3DES-CBC encryption algorithm with a 192-bit key length. Content encryption is seemly to the users, DCTM encrypts/decrypts behind the scenes. Note: EMC licenses all encryption algorithms from RSA Security.

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

Contractors are involved in the design, development, and maintenance of the system. Personal information from eDOCS may be disclosed to these contractors and their officers and employees in performance of their contracts. Those individuals who are provided this information are subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need–to–know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and requirements of DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.

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

No other systems share data or have access to the data in the system. The eDOCS system is interconnected to the eSO Portal in order to provide a central access point for all users.

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

Director of the Office of Management, also designated as the DOE Senior Agency Official for Privacy.

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

No.

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

N/A.

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

The System Owner is responsible for assuring proper use of the data.

PIA Approval Signatures

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