

Template – February 9, 2009, Version 2 Department of Energy Privacy Impact Assessment (PIA)



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	February 9, 2009	
Departmental Element & Site	Office of Fossil Energy, Rocky Mountain Oilfield Testing Center	
Name of Information System or IT Project	RMOTC Unclassified General Support System (GSS)	
Exhibit Project UID	eCPIC UID: FE NPR Casper	
	Name, Title	Contact Information Phone, Email
System Owner	Douglas I. Tunison, LAN Manager	307-233-4836 Doug.tunison@rmotc.doe.gov
Privacy Act Officer	N/A	
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Christy L .Walker, ISSO	307-233-4837 Christy.walker@rmotc.doe.gov
Person Completing this Document	Christy L. Walker, Network Administrator	307-233-4837 Christy.walker@rmotc.doe.gov

Purpose of Information System or IT Project	Rocky Mountain Oilfield Testing Center's (RMOTC) unclassified general support system utilizes no outward facing collection; all information is internal in both hardcopy and electronic form. The system is an aggregation of several business application and practices that support the mission of RMOTC. The information collected is as follows: DOE and contractor staff employment information (ratings/performance evaluations, medical history/condition, criminal record, banking information (when applicable)), in electronic and hardcopy form. Foreign national paperwork required for CRADA's (Passport, Visa, Green card, SSN (when applicable)) in hardcopy form only. Information for students in the 3 winning teams (12-15 students) in the DOE sponsored Wyoming Regional Science Bowl competition required for savings bond purchase (SSN) after the event in hardcopy form only. All personally identifiable information is managed under common security architectures and share common management practices and is governed by RMOTC's procedure for Identifying and Protecting Official Use Only (OUO) information.
Type of Information Collected or Maintained by the System:	 SSN Social Security number Medical & Health Information e.g. blood test results Financial Information e.g. credit card number □ Clearance Information e.g. "Q" □ Biometric Information e.g. finger print, retinal scan ☑ Mother's Maiden Name ☑ DoB, Place of Birth ☑ Employment Information ☑ Criminal History ☑ Name, Phone, Address □ Other − Please Specify

PRIVACY IMPACT ASSESSMENT: Office of Fossil Energy - Rocky Mountain Oilfield Testing Center

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Has there been any attempt to verify Information about an Individual in Identifiable Form does not exist on the system? 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).	YES
If "Yes," what method was used to verify the system did not contain Information in Identifiable Form? (e.g. system scan)	PII Risk Assessment was completed.
Threshold Questions	
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?	YES

If the answer to the <u>all</u> 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		
1.	What categories of individuals are collected or maintained by the information system?	 ☑ Federal Employees ☑ Contractor Employees ☑ 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. ☐ Other, Please Specify
2.	What is the source(s) of information about individuals in the information system?	Staff Information: Individual Foreign National Information: Individual Wyoming Regional Science Bowl Participants Information: Individual or individual's parent
3.	With what other agencies or entities will an individual's information be shared? How will the information be used?	Foreign National information is shared with the United States Department of Energy Counterintelligence Office. It is remotely entered into F.A.C.T.S (Foreign Access Central Tracking System) and is not interconnected to RMOTC's GSS. The Wyoming Regional Science Bowl's first place team information (5 students) is shared with DOE's National Science Bowl Coordinators. It is remotely entered into www.scied.science.doe.gov and is not interconnected to RMOTC's GSS.
4.	Is the use of the information in identifiable form both relevant and necessary for the mission of the organization and DOE?	Yes. Staff employment information is collected in support of DOE/RMOTC's mission. Foreign National information is collected in support of the agency's national security mission. The Wyoming Regional Science Bowl participant information is in support of the DOE sponsored National Science Bowl event.
5.	Are the data elements described in detail and documented?	No.

Module II – System Information for All Systems		
6.	What kinds of reports are produced about individuals or that contain an individual's data?	N/A. No reports about individuals generated.
7.	What will be the use of these reports?	N/A. No reports about individuals generated.
8.	Who will have access to these reports?	N/A. No reports about individuals generated.
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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?	N/A.
10.	What are the retention periods of data in the information system?	Staff Information: Employment information follows applicable RIDS schedules (75 years past closeout). Foreign Nationals: Hard copy information is given to DOE Office of Counterintelligence Annually. Wyoming Regional Science Bowl participants: After event closeout when information is no longer needed documents are destroyed.
11.	What are the procedures for disposition of the data at the end of the retention period?	Information is shredded in accordance with National Archives disposition instructions.
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.	Information is provided on a voluntary basis.

Module II – System Information for All Systems		
13. What controls are in place to protect the data from unauthorized access, modification or use?	All personally identifiable information is managed under common security architectures and share common management practices and is governed by RMOTC's procedure for Identifying and Protecting Official Use Only (OUO) information.	
14. If processes are being consolidated, do the proper controls remain in place to protect the data and prevent unauthorized access?	N/A. Not in transition.	
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?	Staff Information: Employee's supervisor Foreign Nationals: Foreign National Administrative staff Wyoming Regional Science Bowl participants: Wyoming Regional Science Bowl Coordinator No external access to our system from other agencies.	
16. Who will have access to information in identifiable form or and PII?	Staff Information: Employee's supervisor Foreign Nationals Information: RMOTC Foreign National's administrative staff Wyoming Regional Science Bowl participants: Wyoming Regional Science Bowl Coordinator	
17. How is access to the data determined?	All personally identifiable information is managed under common security architectures and share common management practices and is governed by RMOTC's procedure for Identifying and Protecting Official Use Only (OUO) information.	
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?	Yes	

Module II – System Information for All Systems		
19. Do other information systems share data or have access to the data in the system? If yes, explain.	Foreign National information is shared with the United States Department of Energy Counterintelligence Office. It is remotely entered into F.A.C.T.S (Foreign Access Central Tracking System) and is not interconnected to RMOTC's GSS. The Wyoming Regional Science Bowl's first place team information (5 students) is shared with DOE's National Science Bowl Coordinators. It is remotely entered into www.scied.science.doe.gov and is not interconnected to RMOTC's GSS.	
20. For connecting information systems, is there an ISA other agreement between System Owners to ensure the privacy of individuals is protected?	N/A	
21. Who is responsible for assuring proper use of the information system's information in identifiable form?	Michael J. Taylor, Director of Technical Assurance	

Mc	odule III – Systems with	Information About Members of the Public
		Note: Only staff employment information is in electronic form on RMOTC's GSS.
1.	What legal authority authorizes the purchase, development or maintenance of this information system?	RMOTC unclassified GSS system is included in the Capital Planning and Investment and Control (CPIC) process at DOE's Office of Fossil Energy. The Clinger-Cohen Act (CCA) of 1996 requires agencies to use a CPIC process to acquire, use, maintain, and dispose of information technology. The purpose of the CCA is to improve the productivity, efficiency, and effectiveness of federal programs though improved acquisition, use, and disposal of IT resources. DOE has implemented its IT governance processes to support CPIC which involve the selection and approval of programs and systems through the Office of Management and Budget (OMB). Therefore, the legal authority to purchase, development, and maintain RMOTC's GSS system is authorized annually through the CPIC process.
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.	N/A. The system is not a Privacy Act System of Records.
3.	If the information system is being modified, will the SORN require amendment or revision?	N/A. The system is not a Privacy Act System of Records.
4.	How will data collected from sources other than DOE records be verified for accuracy, relevance and completeness?	Data is collected from and/or verified by the source. We rely on the individual to provide accurate information at the time of collection.
		Staff information is kept current by the employee's supervisor.
5.	Are records in the system about individuals current? What steps or procedures are taken to ensure the data is current?	Foreign National information only needs to be accurate during the time required for their site visit to RMOTC. Wyoming Regional Science Bowl information only needs to be accurate through the event and close out.

Module III – Systems with Information About Members of the Public		
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?	N/A. New data is not aggregated.	
7. Will the new or meta data be part of an individual's record?	N/A. New data is not aggregated.	
8. How will the new or meta data be used? Will it be used to make determinations about members of the public?	N/A. New data is not aggregated.	
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.	Retrieved by individual's name.	
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)?	They are advised that information is provided on a voluntary basis.	
11. Will this information system provide the capability to identify, locate, and monitor individuals?	No	
12. What kinds of information are collected as a function of the monitoring of individuals?	N/A	
13. What controls will be used to prevent unauthorized monitoring?	N/A	

PIA Approval Signatures

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