

HSO SPOTLIGHT No. 16 - 2007: Privacy Act, System of Records, & Personally Identifiable Information (PII)

What is the issue:	Headquarters Security Officer (HSO) Recordkeeping Responsibilities and the Privacy Act
Why do we need this?:	Inform HSOs of an appropriate recordkeeping method as it relates to the Privacy Act
Who is impacted?:	Headquarters Security Officers, Alternate HSOs, and HSO Representatives
What does the HSO need to do?:	Perform a review of HSO record files to ensure the method of recordkeeping is not in conflict with the Privacy Act

The DOE Freedom of Information Act and Privacy Act Office raised a concern that HSOs, in performing their responsibilities, may be creating or maintaining files or records in a manner that may be in violation of the Privacy Act. HSO responsibilities, as identified in the Headquarters Facilities Master Security Plan (HQFMSP), include confirming that their Headquarters Element's Federal and contractor employees have met certain security requirements. Some examples of these responsibilities are:

- Confirmation of employee participation in the Annual Security Refresher Briefing (ASRB).
- Periodic review of Federal and contractor personnel in need of retaining an access authorization (security clearance).
- Documentation required when requesting a security clearance or security badge.

In performing these responsibilities, the HQFMSP does not require HSOs to maintain files on individuals. However, for efficiency and programmatic standard practices, HSOs may maintain record files in order to aid them in performing their duties. The files should be maintained by security topics, not by an individual's name or other personal identifier. HSO verification of meeting the requirements of security topics (e.g., ASRB, Security Clearances, etc.) may be through the use of an employee listing. Note however, employee listings must be handled and stored as PII.

What to do about Existing Files containing Privacy Act Information?

The title of record files containing Privacy Act Information **must only be maintained** by “**security topical areas**” (e.g., Annual Security Refresher Briefing, security clearance, security badges, etc.) to be in compliance with the Privacy Act.

If you have any questions, please Ed Szymanski e-mail me at edmund.szymanski@hq.doe.gov or phone 301-903-9990.