

Department of the Energy
Evaluation of Privacy Impacts for Electronic Document Online
Correspondence and Concurrence System (eDOCS)

Name of Project: eDOCS
Bureau: Department of Energy
Project's Unique ID: N/A
Date: April 19, 2006

This document provides a Privacy Impact Assessment (PIA) of the Department of Energy Electronic Document Online Correspondence and Concurrence System (eDOCS). The guidelines for PIAs are contained in a September 26, 2003, memorandum of the Office of Management and Budget (OMB), M-03-22 *OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*, and apply when agencies develop or buy new Information Technology (IT) systems to handle collections of personally identifiable information.

A. CONTACT INFORMATION:

- 1) **Who is the person completing this document?** (Name, title, organization and contact information).

Leroy Valentine, U.S. Department of Energy, CF-40, 19901 Germantown Rd., Germantown, MD 20874, 301-903-2300, Leroy.valentine@hq.doe.gov

- 2) **Who is the system owner?** (Name, organization and contact information).

James N. Solit, Director of Executive Secretariat, U.S. Department of Energy, MA-70, 1000 Independence Ave, SW, Washington, DC 20585, (202) 586-5230, James.Solit@hq.doe.gov

- 3) **Who is the system manager for this system or application?** (Name, organization, and contact information).

Shena Kennerly, U.S. Department of Energy, MA-72, 1000 Independence Ave, SW, Washington, DC 20585, (202)-586-0577, Shena.Blake-Kennerly@hq.doe.gov

- 4) **Who is the IT Security Manager who reviewed this document?** (Name, organization, and contact information).

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5) **Who is the Bureau/Office Privacy Act Officer who reviewed this document?** (Name, organization, and contact information).

Abel Lopez, U.S. Department of Energy, Director, Freedom of Information Act and Privacy Act Office, ME-74, 1000 Independence Avenue, S.W., Washington, DC 20585, (202)-586-5955

B. SYSTEM APPLICATION/GENERAL INFORMATION:

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

a. Is this information identifiable to the individual¹?

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed). **Yes**

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

(If **YES**, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation). **Yes, the system contains information about members of the general public who submit Freedom of Information Act (FOIA) and Privacy Act (PA) requests, members of DOE Advisory Committees, and correspondence to and from Members of Congress, the White House, and other Federal, State and local agencies.**

c. Is the information about employees?

(If yes and there is no information about members of the public, the PIA is required for the DOE IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation). **No.**

2) **What is the purpose of the system/application?**

The primary purpose of the eDOCS is to serve as a tool to manage and control correspondence to and from the Secretary of Energy, the Deputy Secretary, and Under Secretaries through the Office of the Executive Secretariat (EXECSEC), FOIA and PA requesters, and to manage information about members of DOE Advisory Committees. Correspondence may be received from and sent to Members of Congress, White House, Federal Government agencies, State and local

¹ "Identifiable Form" - According to the OMB Memo M-03-22, 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 descriptors).

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.

The proposed automated solution shall provide an efficient electronic document management system and a workflow process that shall ensure that correspondence is addressed in a timely manner. The automated solution also will provide a records management system that will store records in accordance with mandated retention periods.

The system will provide the DOE a state-of-the-art tool that promotes the streamlining of procedures to process external and internal correspondence. Additionally, it shall aid in the tracking of correspondence to efficiently manage the workload among the correspondence processors within the DOE; provide enterprise-wide access to documents and records in a manner that is consistent with current technology; meet the expectations for advanced technology from the DOE diverse customers; capitalize on technology for better full-text and index search and retrieval; ensure that DOE users are able to search and access all of the electronic documents and records that they are entitled to see; and provide defined and ad hoc workflow capabilities to automate required reviews, approvals and routing steps.

C. DATA in the SYSTEM:

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

The categories of individuals include individuals requesting records under the FOIA and PA, members of DOE Advisory Committees, Members of Congress, representatives of organizations, Federal, State, and local agencies, and members of the public.

2) What are the sources of the information in the system?

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other 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 system?

None

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

None

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

The system does not collect information from the employees or the public. However, the system contains information that is maintained in other systems that was collected from individuals. The system may contain the following information about Advisory Committee members, FOIA and PA requesters, Members of Congress, and representatives of organizations, and Federal, State and local agencies: name, home and work address, home and work telephone number, type of business or organizational affiliation, social security number, and date of birth.

3. Accuracy, Timeliness, and Reliability

a. How will data collected from sources other than DOE records be verified for accuracy? b. How will data be checked for completeness? c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

EDOCS does not verify the accuracy or completeness of the general public data. 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. Are the data elements described in detail and documented? If yes, what is the name of the document?

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

NA

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

NA

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

N/A

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

N/A

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

Processes are not being consolidated.

- 8) **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.**

Yes, data is retrieved by name, assigned request control number, and name of member of Congress.

- 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 (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)**

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 their constituents.

Information submitted by DOE Advisory Committees members is voluntarily provided. The information is used by the 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?**

Consistent use of this system across the DOE complex will be maintained by requiring user training and providing users with system operational documentation.

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

Data retention for FOIA and PA records containing requests from the public is in accordance with DOE Administrative Records Schedule 14: Informational Services Records, dated 11/15/02. (see <http://cio.doe.gov/RBManagement/Records/PDF/RS-DOEADM14.PDF>)

Data retention for members of DOE Advisory Committees, congressional constituent inquires and general correspondence files of the Secretary of Energy records stored in this system are in accordance with DOE Administrative Records Schedule 16: Administrative Management Records, dated 6/17/02. (see <http://cio.doe.gov/RBManagement/Records/PDF/RS-DOEADM16.PDF>)

- 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?**

The procedure for disposition includes an automated program within the system that will identify folders and documents in the system that have expired based on their retention schedules. This program is scheduled to run on a monthly basis, and the results are reviewed by cabinet administrators for removal from the system. The disposition log of deleted records is retained indefinitely. The procedures are documented in the eDOCS system maintenance plan to be executed by the system administrators of EDOCS.

- 4) Is the system using technologies in ways that the 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?

There is no affect. DOE is not using any technologies in a way it has not previously employed.

6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.

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?

None.

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

None.

9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

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) -**
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 File of the 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 Privacy Act system of records notice require amendment or revision? Explain.

Yes, the Systems of Records listed above have been reviewed. It has been determined that the new web based system will alter how information is

accessed in the four systems of records. Therefore, a notice will be published in the Federal Register and a report sent to Congress and the Office of Management and Budget informing them of the alteration.

F. ACCESS TO DATA:

1) Who will have access to the data in the system? (e.g., contract managers, system administrators, developers, tribes, other)

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? Are criteria, procedures, controls, and responsibilities regarding access documented?

Access to data is determined by evaluation of personnel 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? Explain.

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? (Please list processes and training materials)

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 appropriate personal information, and use of system audit logs to monitor access and user activity in the system.

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 inserted 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 provided this type of 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 the requirements of the 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 Privacy Official.

8) Will other agencies share data or have access to the data in this system (Federal, State, Local, and Other (e.g., Tribal))?

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?

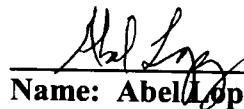
System Owner

The Following Officials Have Approved this Document


1) System Owner

 _____ (Signature) 5/18/06 (Date)
Name: James N. Solit
Title: EDOCS System Owner

2) Privacy Act Officer

 _____ (Signature) 5/17/06 (Date)
Name: Abel Lopez
Title: Freedom of Information Act and Privacy Act Officer

3) Senior Agency Official for Privacy

 _____ (Signature) 5-19-06 (Date)
Name: Ingrid A.C. Kolb
Title: Director of the Office of Management (also DOE Senior Official for Privacy Policy)