SC-1046

Department of Energy

Privacy Impact Assessment (PIA)

Affects Members Of the Public?	X

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.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	April 22, 2010
Departmental Element & Site	Office of Science, Oak Ridge Office (ORO), Oak Ridge, TN
Name of Information System or IT Project	This is a Web 2.0 Social Media Third-Party System (Facebook)
Exhibit Project UID	N/A
New PIA X **Update**	

	Name, Title	Contact Information Phone, Email
System Owner	Ben Williams ORO Public Affairs Specialist	(865) 574-4912 williamsb@oro.doe.gov
Local Privacy Act Officer	Amy Rothrock ORO, Privacy Act Officer	(865) 576-1216 rothrockal@oro.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Qui Nguyen ORO, Information System Security Manager	865-576-1600 Nguyenq@oro.doe.gov

PRIVACY
PROGRAM

MODULE I – PRIVACY NEEDS ASSESSMENT

Person Completing this Document	Ben Williams ORO, Public Affairs Specialist	(865) 574-4912 Williamsb@oro.doe.gov
Purpose of Information System or IT Project	In support of the Administration's aim that federal agencies engage the public via social media vendors, the Oak Ridge Office is engaging a sphere of websites and web-based tools that focus on disseminating information to broaden the reach of communication, engage the public via dynamic dialogue tools, and share useful 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 X Other – Please Specify – Though the public may voluntarily post personally identifiable information (PII) on social networking sites used by the Department, the Department does not own this information and will not collect PII.	
Has there been any attempt to verify PII does not exist on the system? **DOE Order 206.1,** *Department of Energy Privacy Program,* **defines PII as** *any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric*		The Department does not collect, maintain, or disseminate PII from individuals who interact with the Department's social media accounts.

MODULE I – PRIVACY NEEDS ASSESSMENT

data, and including any other personal information that is linked or linkable to a specific individual.	
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	N/A

Threshold Questions

1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?	Yes. However, this is a third-party system. The Department will not collect, maintain, or disseminate PII from individuals who interact on this system.
2. Is the information in identifiable form?	Yes. However, this is a third-party system. The Department will not collect, maintain, or disseminate PII from individuals who interact on this system.
3. Is the information about individual Members of the Public?	Yes. However, this is a third-party system. The Department will not collect, maintain, or disseminate PII from individuals who interact on this system.
4. Is the information about DOE or contractor employees?	Yes. However, this is a third-party system. The Department will not collect, maintain, or disseminate PII from individuals who interact on this system.

If the answer to **all** 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.

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. 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.

PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.

MODULE I – PRIVACY NEEDS ASSESSMENT

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

1. AUTHORITY **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	N/A. The Department does not collect, maintain, or disseminate PII from individuals using this third-party system. The Department is utilizing this social media tool in accordance with the OMB Open Governance Directive.
2. CONSENT **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)?**	Individuals are not required to provide personal information to the third-party system. Individuals may voluntarily contribute their information to the Facebook website with the intent to share the information with others on the website, the ORO does not collect, maintain, or disseminate this information. All information and interaction with the Facebook website is on a strictly voluntary basis; individuals will not be required to use the Facebook website for any reason.
3. CONTRACTS **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?**	Facebook is a third-party social networking website. ORO support contractors are not involved in the design, development, and maintenance the site.

MODULE II – PII SYSTEMS & PROJECTS

4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	The ORO will use its Facebook account as an additional mechanism for disseminating vetted and approved unclassified mission-related information to the public. ORO Public Affairs Office will ensure that information disseminated via the website has been approved for public dissemination. Through this vetting process, the Public Affairs Office, in consultation with the Privacy Act Officer, will conduct a review of any potential privacy risks before disclosing information that may personally identify an individual pursuant to applicable laws, polices, and regulations.
5. SORNs **How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?** **If yes, explain, and list the identifiers that will be used to retrieve information on the individual.**	This is a third-party system. The Department will not collect, maintain, or disseminate PII from individuals who interact on this system.
6. SORNs **Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?** **If "Yes," provide name of SORN and location in the *Federal Register*.**	N/A
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	N/A

DATA SOURCES

8. What are the sources of information about individuals in the information system or project?	Individuals may voluntarily contribute their information to the Facebook website with the intent to share the information with others on the website; the ORO shall not collect, maintain, or disseminate this information.

MODULE II – PII SYSTEMS & PROJECTS

9. Will the information system derive new or meta data about an individual from the information collected?	N/A.
10. Are the data elements described in detail and documented?	N/A.
DATA USE	
11. How will the PII be used?	N/A.
12. If the system derives meta data, how will the new or meta data be used? Will the new or meta data be part of an individual's record?	N/A
13. With what other agencies or entities will an individual's information be shared?	None.
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	None.
15. What will be the use of these reports?	N/A.
16. Who will have access to these reports?	N/A.
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	No.

MODULE II – PII SYSTEMS & PROJECTS

18. What kinds of information are collected as a function of the monitoring of individuals?	N/A
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A

DATA MANAGEMENT & MAINTENANCE

20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records.	The Department will not create individual records.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A.

Retention & Disposition

22. What are the retention periods of data in the information system?	ORO will not retain any information. However, Facebook may keep backup copies of removed or deleted information for up to 90 days, but this information will not be available to others (stated in Facebook's Privacy Policy).
23. What are the procedures for disposition of the data at the end of the retention period?	The Department does not have procedures for disposition of information since it does not collect, maintain, or disseminate PII from individuals using this third-party system.

ACCESS, SAFEGUARDS & SECURITY

24. What controls are in place to protect the data from unauthorized access, modification or use?	The Facebook website has internal controls in place for the protection of data from any unauthorized access, modification or use; ORO shall not provide any controls other than those provided by the Facebook website.
25. Who will have access to PII data?	In the unlikely event that the information posted may constitute PII, those individuals who have access to the ORO Facebook website may have access to that information which may constitute PII.

MODULE II – PII SYSTEMS & PROJECTS

26. How is access to PII data determined?	The Facebook website has internal controls in place for the protection of data from any unauthorized access, modification or use. ORO has a copy of those controls provided by Facebook.
27. Do other information systems share data or have access to the data in the system? If yes, explain.	The Facebook website may share certain information with third-party applications and websites based on users' actions that may constitute information systems. Information shared is usually in the context of measuring the effectiveness of advertisements or utilities on the Facebook Platform. ORO shall modify the application settings on the ORO Facebook website to restrict access by third-party applications and websites to any data on the site to the extent practicable.
28. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected?	N/A.
29. Who is responsible for ensuring the authorized use of personal information?	Individual users shall maintain their discretion in determining the level of access that any other connecting information system has to their information, including any information that is considered subject to privacy considerations. Individuals may voluntarily contribute their information to the ORO Facebook website with the intent to share the information with others on the website.

END OF MODULE II

SIGNATURE PAGE		
	Signature	Date
PIA Approval Signatures	Original Copy Signed and On File with the DOE Privacy Office	7 MAY 2010