E-1078

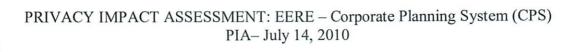|	
Affects Members Of the Public?	X

Department of Energy
Privacy Impact Assessment (PIA)

See DOE Order 206.1, *Department of Energy Privacy Program*, Appendix A, Privacy Impact Assessments, for requirements and additional guidance for conducting a

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	July 14, 2010
Departmental Element & Site	Office of Energy Efficiency and Renewable Energy (EERE) System is located at DOE Headquarters at Forrestal
Name of Information System or IT Project	Corporate Planning System (CPS)
Exhibit Project UID	019-20-01-12-01-1011-00
New PIA X **Update**	

	Name, Title	Contact Information Phone, Email
System Owner	David Crouch Project Manager/General Engineer Office of Information and Business Management Systems	(202) 586-4844 David.crouch@ee.doe.gov
Local Privacy Act Officer	N/A	
Cyber Security Expert reviewing this document (e.g. ISSM,	Dennis Bartlett EERE HQ Cyber Security Program Manager	(202) 586-0874 Dennis.Bartlett@ee.doe.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

CSSM, ISSO, etc.)		
Person Completing this Document	Baback Bazri Associate	(703) 377 4172 bazri_baback@bah.com
Purpose of Information System or IT Project	The primary purpose for CPS is to track funding authorization and budget execution. Corporate Planning System (CPS) is a comprehensive strategic planning system to assist in EERE's need to aggregate project data across program offices. CPS utilizes a common management approach to conducting business, and reduces inefficiencies and costs associated with maintaining a multitude of separate and non-integrated systems. Additionally, CPS helps manage, monitor, and develop Congressional Budget Requests, spend plans, budgets, project data, and portfolio performance. It supports multi-year program planning, AOP development, and automated program guidance letter creation.	
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 CPS maintains data regarding project related contact information of individuals and their place of employment (i.e. The system maintains information regarding the current employer of a contractor or someone DOE does business with) ☐ Criminal History ☒ Name, Phone, Address	

MODULE I – PRIVACY NEEDS ASSESSMENT

☐ Other – Please Specify	
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 data, and including any other personal information that is linked or linkable to a specific individual.*	NO
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
2. Is the information in identifiable form?	YES
3. Is the information about individual Members of the Public?	YES The system maintains contact information on individuals EERE has a business need to contact directly regarding a project or program level issue. This includes information of contractors and other individuals doing business with EERE.
4. Is the information about DOE or contractor employees?	YES The system maintains information of individuals who EERE has a business need to contact directly regarding a project or program level issue. The information maintained is the Name, Work Address, Phone,

MODULE I – PRIVACY NEEDS ASSESSMENT

	Email and Employment History of individuals.

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.

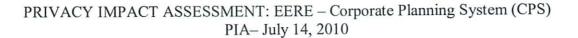## END OF PRIVACY NEEDS ASSESSMENT

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?**	44 U.S.C. 3501 (Paperwork Reduction Act of 1980) 44 U.S.C. 101 (The E-Government Act of 2002)

MODULE II – PII SYSTEMS & PROJECTS

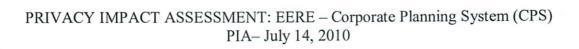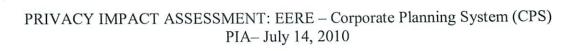|	
2. CONSENT **What opportunities do individuals have to decline to provide information (e.g. where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?**	All employees consent to providing their names, addresses, phone numbers, and employment information into the CPS information system. All information is voluntarily submitted by the individual.
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?**	Yes, contractors are involved with the maintenance of the system. All contractors are required to sign the HQ LAN Rules of Behavior. Affected contracts include the appropriate FAR privacy contract clauses.
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	The system contains personally identifiable information such as names, phone numbers, addresses and employment information of individuals. This information is low risk PII and the potential for privacy concerns if the system happened to be compromised is low.
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.**	The search function within CPS only provides the project roles and project information. Users cannot search through a unique identifier to produce individual's PII.

MODULE II – PII SYSTEMS & PROJECTS

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._**	NO
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?**	Users of the system voluntarily input their data in order to create and manage their portfolios (i.e. monitor project data, budgets, spend plans, portfolio performance) in real time.
9. **Will the information system derive new or meta data about an individual from the information collected?**	No, New or meta data is not derived from the individual's information.
10. **Are the data elements described in detail and documented?**	CPS does not list and describe the information (i.e. names, addresses, phone numbers and employment information) it collects.

DATA USE

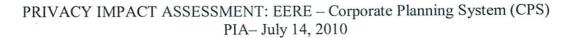|	
11. **How will the PII be used?**	PII is used to provide contact information and providing project updates, to the individuals that have requested the information.

MODULE II – PII SYSTEMS & PROJECTS

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, CPS does not derive meta data from the information collected.
13. With what other agencies or entities will an individual's information be shared?	CPS currently interconnects with database management systems to eliminate the need for duplicate data entry to bring information into a structure that enables enhanced headquarters use of data. Data is entered directly into the Project Management Information System (ProMIS) by National Energy Technology Laboratory (NETL), the Project Management Database (GFO-PMD) by Golden Field Office, Windows System Approach to Grants Administration (WinSAGA) and the Encore database.

Reports

14. What kinds of reports are produced about individuals or contain an individual's data?	CPS does not produce reports pertaining to individuals or individual's data.
15. What will be the use of these reports?	N/A, CPS does not produce reports pertaining to individuals or individual's data.
16. Who will have access to these reports?	N/A, CPS does not produce reports pertaining to individuals or individual's data.

Monitoring

17. Will this information system provide the capability to identify, locate, and monitor individuals?	The CPS system includes names, phone numbers, addresses and employment information. Therefore, if the system and/or data are compromised this information could be used to locate individuals
18. What kinds of information are collected as a function of the monitoring of individuals?	The CPS system does not have the capability to monitor individuals.

MODULE II – PII SYSTEMS & PROJECTS

19. Are controls implemented to prevent unauthorized monitoring of individuals?	The CPS system has controls in place to prevent unauthorized monitoring of individuals.

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.	All records are kept up to date and accurate through the Central Contract Registry. The information is updated when an individual's status has changed.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	The system is only operated at one site, EERE Headquarters.

Retention & Disposition

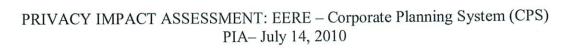| 22. What are the retention periods of data in the information system?	All CPS information is backed up on a daily and weekly basis. Additionally, quarterly backups are performed with the backup tapes then being rotated off-site on a quarterly basis and archived indefinitely.
23. What are the procedures for disposition of the data at the end of the retention period?	The procedures around the disposition of data are documented in the Hard Disk Sanitization Procedures. The EERE Support Team uses BCWipe for sanitization of hard disks on systems that will either be transferred or retired.

ACCESS, SAFEGUARDS & SECURITY

24. What controls are in place to protect the data from unauthorized access, modification or use?	The CPS system has controls in place to prevent unauthorized access, modification and use.
25. Who will have access to PII data?	Any user with a CPS account can access the PII data.

MODULE II – PII SYSTEMS & PROJECTS

26. How is access to PII data determined?	For new access, an access request form is completed by the user and sent to the CPS Support Desk. The CPS administrator reviews the access request form and inquires with the user's program manager to determine if access request and roles are appropriate. Once approved, the CPS Support Team creates an account with the approved roles. If super-admin level access is requested, only the existing super-administrator can grant that level access. CPS user accounts are created through the web-based system and approved user privileges are role based. CPS Support Team grant permissions and access that is commensurate with the employee's job description, roles and responsibilities Audit trails are maintained for account creation, modification, disabling and termination.
27. Do other information systems share data or have access to the data in the system? If yes, explain.	CPS has interconnections with NETL's Project Management Information System (ProMIS), Golden Field Office's Project Management Database (GFO-PMD), and Windows System Approach to Grants Administration (WinSAGA), and the Encore database. These connections are all one way data paths. CPS pulls updated project information from them but does not transmit any CPS data back to them.
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?	Currently there is an Interconnection Security Agreement (ISA) in place for the GFO-PMD and Encore interconnections, respectively, which is used to ensure the privacy of individuals is protected. However, ISAs for ProMIS and WinSAGA are not in place.
29. Who is responsible for ensuring the authorized use of personal information?	System Owner Cyber Security Program Manager

END OF MODULE II

SIGNATURE PAGE		
	Signature	Date
PIA Approval Signatures	Original Copy Signed and On File with the DOE Privacy Office	08/24/2010