



E-1065

Department of Energy  
Privacy Impact Assessment (PIA)

Affects  
Members  
Of the Public?

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	2nd February 2010.	
Departmental Element & Site	Office of Environmental Management, Headquarters (EM-72). The servers for the Livelink Records Management System are at EM's Savannah River Site. The federal EM Records Center (EMRC) system owners are in Germantown, MD	
Name of Information System or IT Project	EMRC Livelink Records Management System	
Exhibit Project UID	019-10-01-15-02-8027-00	
New PIA <input checked="" type="checkbox"/> Update <input type="checkbox"/>	Please indicate whether this is a new PIA or an update to an existing PIA. List the name of the PIA being updated.	
	Name, Title	Contact Information Phone, Email
System Owner	System Owners are Departmental Element officials responsible for monitoring the information systems under their purview to ensure compliance with this Order. System Owners are responsible for the overall	Jeanne Beard <a href="mailto:Jeanne.Beard@hq.doe.gov">Jeanne.Beard@hq.doe.gov</a> (202) 586-0200



PRIVACY IMPACT ASSESSMENT: DOE Office of Environmental Management – Livelink Records Management System  
PIA Template Version 3 – May, 2009

## MODULE I – PRIVACY NEEDS ASSESSMENT

	procurement, development, integration, maintenance, secure operation, and safeguarding of Privacy information including PII for their information system(s). System owners may be Federal or contractor employees.	
<b>Local Privacy Act Officer</b>	Privacy Act Officers or Privacy Points of Contact (PPCs) are designated by the Head of the Departmental Element. PAOs and PPCs advocate and promote Privacy program activities within their Departmental Elements, as well as advise and provide Privacy Act subject matter expertise to their Departmental Elements, specifically with regard to conducting PIAs and completing the SORN process.	Jerry Hanley <a href="mailto:Jerry.Hanley@hq.doe.gov">Jerry.Hanley@hq.doe.gov</a> 202-586-0483
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	System Owners must engage cyber security experts to review this PIA prior to submission to the Privacy Office. Each organization may have these responsibilities assigned a little differently (i.e. Information System Security Officer (ISSO) or other cyber security professional).	Stanley Wujcik <a href="mailto:Stanley.Wujcik@em.doe.gov">Stanley.Wujcik@em.doe.gov</a> 202-586-7228
<b>Person Completing this Document</b>	Name and title of the person(s) completing this document.	Patricia Nichols <a href="mailto:Patricia.Nichols@em.doe.gov">Patricia.Nichols@em.doe.gov</a> 202-586-7263



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Purpose of Information System or IT Project</b>	<p>Livelink Records Management System will be used to manage the records of Department of Energy (DOE) EM Headquarters (HQ). Each agency is, per Federal Law, required to manage its records from creation through final disposition. DOE's Directive – DOE O 243.1 – provides guidance for how DOE's program offices are to manage their records. The EMRC's Livelink Records Management System is an integral part of EM's strategy to manage EM HQ's records.</p> <p>Records managed in EMRC's Livelink Records Management System include general correspondence, reports, and other types of documentary records created in the course of EM's business operations.</p> <p>EMRC's Livelink Records Management system will also be used to manage physical records (e.g. paper records) throughout their lifecycle, up to and including their final disposition.</p>
<b>Type of Information Collected or Maintained by the System:</b>	<p>EMRC will only maintain records in the Livelink Records Management System. These records are created by business owners in other parts of EM HQ. The records may be created virtually and stored in Livelink Records Management System. Alternatively, the business owners may send paper records (or in other physical format e.g. film) to EMRC. The EMRC intends to scan paper records into Livelink Records Management System. It is possible that these records may contain all or some of the PII listed below. The categories checked below are PII that EMRC has encountered in its current work. However, the EMRC personnel play no role in collecting any information from individuals. They simply receive records, which they intend to manage in Livelink Records Management System.</p> <p>EMRC collects these records under the authority of Federal Law and DOE Order:</p> <ul style="list-style-type: none"><li>• <i>U.S. Code of Federal Regulations (CFR), Title 44, United States Code 3301 (44 U.S.C. 3301), that defines Federal records as "All books, paper, maps, photographs, machine readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U. S. Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government, or because of the informational value of data in them."</i></li><li>• <i>DOE Directive – DOE O 234.1: Records Management Program</i></li></ul>



## MODULE I – PRIVACY NEEDS ASSESSMENT

	<p><input checked="" type="checkbox"/> SSN Social Security number</p> <p><input type="checkbox"/> Medical &amp; Health Information e.g. blood test results</p> <p><input type="checkbox"/> Financial Information e.g. credit card number</p> <p><input type="checkbox"/> Clearance Information e.g. "Q"</p> <p><input type="checkbox"/> Biometric Information e.g. finger print, retinal scan</p> <p><input type="checkbox"/> Mother's Maiden Name</p> <p><input type="checkbox"/> DoB, Place of Birth</p> <p><input type="checkbox"/> Employment Information</p> <p><input type="checkbox"/> Criminal History</p> <p><input checked="" type="checkbox"/> Name, Phone, Address</p> <p><input checked="" type="checkbox"/> Other – Please Specify</p>
<p>The system also holds records that do not have PII. These records include information relating to the business of DOE EM – clean up of the nation's legacy nuclear waste sites.</p>	

Has there been any attempt to verify PII does not exist on the system?	NO
DOE Order 206.1, <i>Department of Energy Privacy Program</i> , 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.	There are no records in EM's Livelink Records Management System currently.  Once records are entered, it is possible that these records may contain PII listed above. However, the EMRC personnel do not collect any information from individuals. They simply receive records, which they intend to manage in Livelink Records Management System.
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	Not applicable



## MODULE I – PRIVACY NEEDS ASSESSMENT

### 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  (If "Yes," place an "X" in the box at the top of first page.)
3. Is the information about individual Members of the Public?	YES  <i>Member of the Public</i> refers to individuals in a non-employee or DOE contractor context. <i>Members of the Public</i> includes individuals for whom DOE maintains information, as required by law, who were previously employed or contracted by DOE
4. Is the information about DOE or contractor employees?	YES or NO (If Yes, select with an "X" in the boxes below)  <input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> Contractor Employees  Safeguards, as expressed in Q 24 below, are built in to reduce any risks of privacy breaches that may occur by unauthorized DOE employees or external attacks.

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.**



## MODULE I – PRIVACY NEEDS ASSESSMENT

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?**

The legal authorities that authorize the purchase and development of this system are:

- Federal Records Act (44 U.S.C. 3301)
- Clinger Cohen Act of 1996 (Information Technology Management Reform Act)
- Office of Management and Budget (OMB) Circular A-130 - Management of Federal Information Resources
- Paperwork Reduction Act
- e-Gov Act
- U.S. Code of Federal Regulations (CFR), Title 44, United States Code 3301 (44 U.S.C. 3301)
- DOE Directive – DOE O 243.1: Records Management Program



## MODULE II – PII SYSTEMS & PROJECTS

<b>2. CONSENT</b>  <b>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)?</b>	<p>Individuals do not provide EMRC any information. This system only stores records, which EM's employees, both Federal and contractor, created in their regular business operations. At the end of the active phase of the records' lifecycle, EM HQ offices send their records to the EMRC, which intends to scan and store certain sets of records in EM's Livelink Records Management System.</p> <p>This records management system does not interface with the public and the system operators do not request or provide information to individuals of the public</p>
<b>3. CONTRACTS</b>  <b>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?</b>	<p>Yes. Contractors are involved with the design, development and maintenance of the system.</p> <p>Yes. The privacy clause is included in their contract</p>
<b>4. IMPACT ANALYSIS:</b>  <b>How does this project or information system impact privacy?</b>	<p>This system does not impact individual's privacy. All information retained in the system is information that the individuals provided as part of their routine business or interaction with DOE EM. The Livelink Records Management System simply contains that information.</p>
<b>5. SORNs</b>  <b>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</b>  <b>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</b>	<p>Records can be retrieved via key word search. There is a "Google-type" full-text search capability in the records management system, which will search the system's database for records.</p> <p>In all business operations, the EMRC will use non-PII key words to retrieve records. In these cases, it is possible that a retrieved record may contain PII.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>6. SORNs</b></p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?  If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	Not Applicable.
<p><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	Not Applicable.
<b>DATA SOURCES</b>	
<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	Individuals do not input information into the Livelink Records Management System. The EMRC does not create these records. Instead, EMRC will receive and maintain in the system records created by EM federal employees and contractor personnel in the day-to-day operation of the EM program.
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	No. It is not permissible, by law, to take various elements of records that may exist within an electronic records management system and aggregate these elements to create new material.
<p><b>10. Are the data elements described in detail and documented?</b></p>	No data elements are created by putting records in Livelink Records Management.
<b>DATA USE</b>	



## MODULE II – PII SYSTEMS & PROJECTS

<b>11. How will the PII be used?</b>	PII is not used by EMRC's Livelink Records Management System. The system simply holds records created by other EM HQ offices as part of their regular business operations.
<b>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?</b>	EMRC's Livelink Records Management System will not derive new meta data.
<b>13. With what other agencies or entities will an individual's information be shared?</b>	Other Federal agencies or public and private entities can request records as part of litigation-related discovery or trial or under Freedom of Information Act (FOIA).
<b>Reports</b>	
<b>14. What kinds of reports are produced about individuals or contain an individual's data?</b>	No reports about individuals are produced by this system.
<b>15. What will be the use of these reports?</b>	Not applicable.
<b>16. Who will have access to these reports?</b>	Not applicable.
<b>Monitoring</b>	



## MODULE II – PII SYSTEMS & PROJECTS

17. Will this information system provide the capability to identify, locate, and monitor individuals?	EMRC's Livelink Records Management System provides EMRC no capability to update or aggregate any information about individuals which it could then use to monitor any identified persons. The business of the EMRC does not include monitoring or locating individuals or locating information about individuals unless in accordance with a specific request for materials.
18. What kinds of information are collected as a function of the monitoring of individuals?	Not applicable.
19. Are controls implemented to prevent unauthorized monitoring of individuals?	Not applicable.
<b>DATA MANAGEMENT &amp; MAINTENANCE</b>	
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.	<p>The business of EMRC does not involve keeping current or verifying individuals' PII. Instead the EMRC receives records from EM HQ business offices, which have been created as an outcome of the regular business operations of these offices. Records that the EMRC will maintain in its Livelink Records Management System are artifacts which satisfy 44 U.S.C 3301 definition:</p> <p><i>... "records" includes all books, papers, maps, photographs, machine readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them...</i></p> <p>Per the law, records once created are not changed.</p>
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 used at EM HQ.



## MODULE II – PII SYSTEMS & PROJECTS

Retention & Disposition	
<p><b>22. What are the retention periods of data in the information system?</b></p>	<p>Retention of records is determined by the National Archives and Records Administration (NARA) and DOE record schedules. EMRC will retain permanent records in the Livelink Records Management system for specified durations at the end of which EMRC transfers these records to NARA. The schedule may require EMRC to hold permanent records for significant durations (e.g. 20 years).</p> <p>Temporary records will be retained in EMRC's Livelink Records Management System for varying periods, depending on the record's retention schedule and then destroyed. The retention periods of temporary records can be significant (10+ years).</p>
<p><b>23. What are the procedures for disposition of the data at the end of the retention period?</b></p>	<p>Records or copies of records will be retained in the Livelink records management system for varying periods, which are determined by DOE records schedules.</p> <p>Records in Livelink are dispositioned through a series of stages and each stage represents a period of time a record is maintained in the Livelink system before proceeding to the next stage in its life cycle. After a record has reached its final stage, it is available for final disposition. Automatic disposition search reports will be run periodically to search for records that have reached the end of their life cycle. The Records Officer (RO) will be notified via electronic mail of the results of these disposition searched. Once the RO has been notified, he/she may login to the Livelink records management system and choose to either dispose of a set of records immediately or at a later time.</p> <p>Reports of disposition are retained.</p>

## ACCESS, SAFEGUARDS & SECURITY



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>24. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the Under Secretary of Energy's Program Cyber Security Plan (PCSP) and DOE Directives. The system was certified and accredited and was found to have mitigated risk to an acceptable level.</p> <p>Controls per Under Secretary of Energy's Program Cyber Security Plan:</p> <ul style="list-style-type: none"><li>• Place behind the second of two firewalls with limited ports open for communication between servers.</li><li>• Lock out attempt set to three attempts per PCSP requirements.</li><li>• Session state set to 30 minutes inside of Internet Information Services (IIS).</li><li>• Traffic is transmitted over SSL encryption which is FIPS 140-2.</li></ul> <p>Specific controls for Livelink Records Management System are:</p> <ul style="list-style-type: none"><li>• Before a user can login to the Livelink records management system, they must authenticate through Active Directory and Livelink. Once they have been authenticated, Livelink uses a binary mask to control whether a user has access to files, folders, and other usable objects in the Livelink records management system.</li><li>• The records management folder structure is located in a separate folder structure in Livelink, which will only be accessible to EM personnel who have been designated by the EM HQ Records Officer.</li><li>• Using file permissions, access to records will be controlled both at the folder and the individual record level to authorized users only.</li><li>• Finally, Livelink maintains a summary of events performed on a document through an audit trail which records the event performed on a document, the date and time the event was performed, and the user who performed the event.</li></ul>
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## MODULE II – PII SYSTEMS & PROJECTS

<b>25. Who will have access to PII data?</b>	<p>Staff responsible for the following functions will have access to records in EM's Livelink Records Management system. Some, not all, of these records may contain PII:</p> <p>EM Program Records Officer EM Records Officers EM Records Liaison Officers Contractor staff designated by the EM Program Records Officer Livelink Records Management Administrator</p>
<b>26. How is access to PII data determined?</b>	DOE Directive – DOE O 243.1: Records Management Program – presents the Roles and Responsibilities of principals in the HQ records management program. EMRC personnel have access to all or some of the records in the records management system based on the permissions assigned them. Some records may contain PII. EMRC, however, has no prior notice of which records these may be. EMRC does not create these records, only maintains them.
<b>27. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	No other systems share or have access to data in this system.
<b>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?</b>	Not applicable.



## MODULE II – PII SYSTEMS & PROJECTS

**29. Who is responsible for ensuring the authorized use of personal information?**

DOE Directive – DOE O 243.1: Records Management Program – presents the Roles and Responsibilities of principals in the HQ records management program. EMRC will provide records in response to specific requests. Once delivered, the requestors are responsible for protecting PII in any records they request.

**END OF MODULE II**

## SIGNATURE PAGE

PIA Approval Signatures	Signature	Date
	<b>Original Copy Signed and On File with the DOE Privacy Office</b>	7 MAY 2010