



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

Department of Energy
Privacy Impact Assessment (PIA)

E-1075

Affects Members Of the Public?	<input checked="checked" type="checkbox"/>
--------------------------------	--

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	07/26/2010	
Departmental Element & Site	Office of Environmental Management, Consolidated Business Center – Chiquita Center, 250 E 5 th St Cincinnati, OH 45202 Consolidated Business Center – 175 Tri-County Springdale, OH 45246	
Name of Information System or IT Project	Environmental Management Consolidated Business Center (EMCBC) General Support System (GSS)	
Exhibit Project UID	CBC Application and Data eCPIC UID: 019-60-01-00-01-5000-04	
New PIA <input type="checkbox"/>	EMCBC completed PIA's July, 2007 for individual database applications running within the CBC Cincinnati-EMCBC GSS Accreditation Boundary. This PIA is an update of those.	
Update <input checked="checked" type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Ward Best Assistant Director, Information Resource Management EMCBC, U.S. Department of Energy	(513) 246-0530 Ward.Best@emcbc.doe.gov



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Marian Wilcox Office of Legal Services EMCBC, U.S. Department of Energy	Phone (513) 246-0582 Fax (513) 246-0524 marian.wilcox@emcbc.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Grant Sewell Cyber Security Engineer, ISSO EMCBC, U.S. Department of Energy	(513) 246-0538 grant.sewell@emcbc.doe.gov
Person Completing this Document	Susan Marsh Information Resource Management EMCBC, U.S. Department of Energy	(513) 246-0224 susan.marsh@emcbc.doe.gov
Purpose of Information System or IT Project	<p>The DOE Office of Environmental Management – Consolidated Business Center (EMCBC) was established to provide Environmental Management customer sites with a full range of business support services, including those involving financial, contracting, logistics, information management, diversity, legal and human resources support and to provide access to necessary technical skills/knowledge that sites themselves lack.</p> <p>The EMCBC was established in October 2004 to consolidate support functions of DOE's Environmental Management closure sites and other designated sites in the areas of: human resources, financial management, contracting/procurement, information management, logistics, legal services, and technical support.</p> <p>The EMCBC General Support System is comprised of network devices and applications in support of the EMCBC mission.</p>	



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

MODULE I – PRIVACY NEEDS ASSESSMENT

**Type of Information
Collected or
Maintained by the
System:**

- ☒ SSN
- ☒ Medical & Health Information
- ☐ Financial Information
- ☐ Clearance Information
- ☐ Biometric Information
- ☐ Mother's Maiden Name
- ☒ DoB, Place of Birth
- ☒ Employment Information
- ☐ Criminal History
- ☒ Name, Phone, Address
- ☒ Other – Employee ID Number

Has there been any attempt to verify PII does not exist on the system?

No

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.

If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

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
3. Is the information about individual Members of the Public?	Yes
4. Is the information about DOE or contractor employees?	Yes <input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> Contractor Employees

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



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

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?	DOE Privacy Act of 1974; Publication of Compilation of Privacy Act Systems of Records - DOE 55 Freedom of Information Act and Privacy Act Requests for Records
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)?	Since these systems are based on individuals contacting DOE and/or Department of Labor (DOL) to provide the data, there is no requirement to provide any information.
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 were involved with the design and development of the system and will be involved with the maintenance of the system. 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 they may obtain in accordance with the provisions of the Privacy Act and the requirements of DOE. The individuals providing 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.
4. IMPACT ANALYSIS: How does this project or information system impact privacy?	N/A



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

MODULE II – PII SYSTEMS & PROJECTS

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.

Data is retrieved using the social security number in conjunction with the name of the individual and location of employment.

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*.

DOE 55 Freedom of Information Act and Privacy Act Requests for Records

DOE-5 Personnel Records of Former Contractor Employees

DOE-10 Energy Employees Occupational Illness Compensation Program Act Files

DOE-35 Personnel Radiation Exposure Records

DOE-33 Personnel Medical Records

DOE-72 The DOE Radiation Study Registry

7. SORNs

If the information system is being modified, will the SORN(s) require amendment or revision?

System is not being modified.



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

MODULE II – PII SYSTEMS & PROJECTS

DATA SOURCES

8. What are the sources of information about individuals in the information system or project?

Information is obtained from the individual who submits request.

9. Will the information system derive new or meta data about an individual from the information collected?

No

10. Are the data elements described in detail and documented?

Yes

DATA USE

11. How will the PII be used?

The primary purpose of the FOIA/PA database is to serve as a tool to record, control, and determine the status of FOIA and PA requests; produce statistical reports; and as a data source for management information.

The primary purpose of the EEOICPA system is to collect and maintain information needed by the Environmental Management Consolidated Business Center (EMCBC) at the DOE to assist current and former DOE employees and contractor employees or their families in connection with filing EEOICPA claims for conditions that may be due to exposures during employment by or for DOE. The system is used to track EEOICPA claim requests submitted to the Department of Labor (DOL) and National Institute of Occupational Safety and Health (NIOSH). This system contains social security numbers, employee names and work location.



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

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
13. With what other agencies or entities will an individual's information be shared?	DOL
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Name, Address, Employee ID Number, Birth Date, SSN, Medical Information, Employment Date(s), Location of Employment
15. What will be the use of these reports?	<p>The primary purpose of the FOIA/PA database is to serve as a tool to record, control, and determine the status of FOIA and PA requests; produce statistical reports; and as a data source for management information.</p> <p>The primary purpose of the EEOICPA system is to collect and maintain records needed by the Environmental Management Consolidated Business Center (EMCBC) at the DOE to assist current and former DOE employees and contractor employees or their families in connection with filing EEOICPA claims for conditions that may be due to exposures during employment by or for DOE. The system is used to track EEOICPA claim requests submitted to the Department of Labor (DOL) and National Institute of Occupational Safety and Health (NIOSH). This system contains social security numbers, employee names and work location.</p>
16. Who will have access to these reports?	Only responsible personnel as designated by the Data Owner (cognizant Assistant Director, EMCBC) will have access to these reports.



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

MODULE II – PII SYSTEMS & PROJECTS

Monitoring

17. Will this information system provide the capability to identify, locate, and monitor individuals?	No
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A This system is not used to monitor individuals.
19. Are controls implemented to prevent unauthorized monitoring of individuals?	Access to the data is restricted to those individual that have a need to the data for job functions. Types of data extractions and access are logged. This system has undergone ST&E, Certification and Authorization to Operate as per the DOE Energy PCSP and DOE 205.1A

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.	Data is collected directly from the individual. There is an assumption of accuracy for records from the Department of Labor. Data is updated per the request of the individual, such as change of address.
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 operated within one accreditation boundary.

Retention & Disposition



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

MODULE II – PII SYSTEMS & PROJECTS

22. What are the retention periods of data in the information system?

The records retention periods are in accordance with applicable National Archives Records Administration (NARA) and DOE record schedules.

The data will be destroyed when it is no longer needed for tracking a request in accordance with applicable NARA and DOE record schedules.

23. What are the procedures for disposition of the data at the end of the retention period?

Specific data retention periods have not yet been established. These systems are only used as aids for finding hard data, and usually these systems are maintained in conjunction with the need for data.

ACCESS, SAFEGUARDS & SECURITY

24. What controls are in place to protect the data from unauthorized access, modification or use?

Access to the data is restricted to those individual that have a need to the data for job functions. Types of data extractions and access are logged. This system has undergone ST&E, Certification and Authorization to Operate as of August 2008 as per the DOE Energy PCSP and DOE 205.1A and was found to have mitigated risk to an acceptable level

25. Who will have access to PII data?

System Administrators, Developers, Authorized Users, Authorized Managers

26. How is access to PII data determined?

Access is determined through Account Access Procedures and is limited to data needed by the individual. Access is controlled at the application level.

27. Do other information systems share data or have access to the data in the system? If yes, explain.

No

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



PRIVACY IMPACT ASSESSMENT:
Environmental Management Consolidated Business Center-General Support System

PIA Template Version 3 – May, 2009

MODULE II – PII SYSTEMS & PROJECTS

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

The EMCBC Office of Information Resource Management, and the cognizant Assistant Director

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