



Affects Members Of the Public?	<input checked="" type="checkbox"/>
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Department of Energy  
 Privacy Impact Assessment (PIA)

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**

<b>Date</b>	April 12, 2012
<b>Departmental Element &amp; Site</b>	Departmental Element: Office of Energy Efficiency and Renewable Energy Site: APPRISE Incorporated, 32 Nassau Street, Suite 200, Princeton, NJ 08542
<b>Name of Information System or IT Project</b>	WAP Client Contact Information System
<b>Exhibit Project UID</b>	Subcontract 4000082266 under ORNL Contract DE-AC05-00OR22725
<b>New PIA</b> <input checked="" type="checkbox"/>	
<b>Update</b> <input type="checkbox"/>	

	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	Bruce Tonn, ORNL Principle Investigator	(865) 574-4041 tonnbe@ornl.gov
<b>Local Privacy Act Officer</b>	Amy Rothrock, DOE ORO Privacy Act Officer	(865) 576-1215 RothrockAL@oro.doe.gov
<b>Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)</b>	David Hamrin, ORNL Technical Leader - Information Security	(865) 574-6752 hamrindr@ornl.gov



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Person Completing this Document</b>	Bruce Tonn, Principle Investigator	(865) 574-4041 tonnbe@ornl.gov
<b>Purpose of Information System or IT Project</b>	The purpose of the project is to collect the name, address, and telephone number of clients of the Weatherization Assistance Program (WAP) The information is used to conduct surveys of client experiences with WAP.	
<b>Type of Information Collected or Maintained by the System:</b>	<input type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify	
<b>Has there been any attempt to verify PII does not exist on the system?</b>  <b>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.</b>	Yes – Data are received from WAP agencies. No PII is being collected.	
<b>If "Yes," what method was used to verify the system did not</b>	APPRISE staff review file contents	



## MODULE I – PRIVACY NEEDS ASSESSMENT

contain PII? (e.g. system scan)

with each providing agency and then use Stata programs to confirm that the contents of each field are consistent with the agency description.

### 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?	NO <input type="checkbox"/> Federal Employees <input 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



## MODULE II – PII SYSTEMS & PROJECTS

### AUTHORITY, IMPACT & NOTICE

<p><b>1. AUTHORITY</b></p> <p><b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b></p>	<p>Authority to conduct survey and evaluation activity can be found in 10 CFR 440, Section 440.23(a) mandating that the Secretary of Energy shall "...monitor and evaluate the operation of projects carried out by CAA's [community action agencies] receiving financial assistance under this part through on-site inspections, or through other means, in order to ensure the effective provision of weatherization assistance for the dwelling units of low-income persons."</p> <p>As provided in DOE O 206.1, "The Privacy Act allows an agency to maintain information about an individual that is relevant and necessary to the purpose of the agency as required by statute or by Executive Order of the President."</p>
<p><b>2. CONSENT</b></p> <p><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>	<p>WAP clients who are willing to share information sign a data release form when applying for program services.</p> <p>WAP clients are contacted and asked to participate in a survey. Survey participation is voluntary. Survey respondent receive a cash incentive for their participation.</p>
<p><b>3. CONTRACTS</b></p> <p><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>	<p>Yes</p> <p>Yes. The terms and conditions in Subcontract 4000082266 include the following:</p> <p>"7.3 PRIVACY ACT</p> <p>If performance involves design, development or operation of a system of records on individuals, this Agreement incorporates by reference FAR 52.224-1 Privacy Act Notification (Apr 1984) and FAR 52.224-2 Privacy Act (Apr 1984)."</p>
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>This data file allows APPRISE to contact WAP clients who have signed a data release agreement by mail or by phone.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>5. SORNs</b></p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>Each client in the data file is assigned a unique ID by APPRISE. That ID is used to retrieve data. No PII is being collected so therefore cannot be retrieved.</p>
<p><b>6. SORNs</b></p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>NO. No PII is being collected.</p>
<p><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<p><b>DATA SOURCES</b></p>	
<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>Local Weatherization Assistance Program Agencies/Subgrantees</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>The purpose of this data file is to facilitate contact for a voluntary survey with the WAP client. No other use is made of the data.</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>Yes. There is a codebook that describes the contents of the system.</p>



## MODULE II – PII SYSTEMS & PROJECTS

### DATA USE

11. How will the PII be used?

No PII is being collected.

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?

The data file will not be used to derive meta data.

13. With what other agencies or entities will an individual's information be shared?

The individual's information will be shared with a telephone survey contractor who will use the phone number to contact the WAP client for a voluntary survey.

### Reports

14. What kinds of reports are produced about individuals or contain an individual's data?

No reports will be produced that include the individual or the individual's data.

15. What will be the use of these reports?

Not Applicable

16. Who will have access to these reports?

Not Applicable

### Monitoring

17. Will this information system provide the capability to identify, locate, and monitor individuals?

The data file will contain a field that indicates whether the individual elected to participate in the survey.

18. What kinds of information are collected as a function of the monitoring of individuals?

The only information monitored is whether or not the client participated in the survey.



## MODULE II – PII SYSTEMS & PROJECTS

**19. Are controls implemented to prevent unauthorized monitoring of individuals?**

Yes. Only APPRISE staff who are managing the survey have access to the information about the client's participation in the survey. The directory with the information is password protected.

### 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 only information on individuals in the data file is name, address, and phone number. The only way of verifying the information is to make a survey contact attempt. If the phone number is not valid, or the advance letter is returned as undeliverable, that information is recorded in the system.

**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 data file is only operated at one site.

### Retention & Disposition

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

The retention period for the data is the duration of this subcontract (9/30/2013).

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

The APPRISE systems manager will delete the data from the file after the expiration of the contract.

### ACCESS, SAFEGUARDS & SECURITY

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

APPRISE has a data security plan that governs the treatment of an individual's data, restricts access to that data, and ensures that all staff who have access to that data are properly trained on data security procedures.

**25. Who will have access to PII data?**

No PII data is being collected.

**26. How is access to PII data determined?**

No PII data is being collected.



## MODULE II – PII SYSTEMS & PROJECTS

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

No other systems are interconnected with this data.

**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?**

Not applicable.

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

No PII is being collected

**END OF MODULE II**





## SIGNATURE PAGE

	Signature	Date
<b>System Owner</b>	<p><u>Bruce Tonn</u> (Print Name)</p> <p><u><i>Bruce Tonn</i></u> (Signature)</p>	<p><u>5-22-12</u></p>
<b>Local Privacy Act Officer</b>	<p><u>Amy Rothrock</u> (Print Name)</p> <p><u><i>Amy Rothrock</i></u> (Signature)</p>	<p><u>5/22/2012</u></p>
<b>Jerry Hanley</b> Chief Privacy Officer	<p><u><i>Jerry Hanley</i></u></p>	<p><u>05/29/12</u></p>
   		