**STANFORD UNIVERSITY**
# SLAC National Accelerator Laboratory
Operated by Stanford University for the U.S. Department of Energy

## DOE Order 206.1, Chg. 1 – Department of Energy Privacy Program (11/1/2018)
### Site Compliance Plan (2/11/2021)

## Contents

## Introduction

This Site Compliance Plan (SCP):
a) corresponds with the version of the DOE Order on Department of Energy Privacy Program listed in the Prime Contract,
b) outlines the specific CRD sections that apply to SLAC and the respective method of compliance clarifies that the Lab "In compliance". The applicable sections identified herein define SLAC's Baseline Level of Protection (BLP) as it correlates with the CRD and the SLAC Site Security Plan (SSP), states how the Laboratory complies with applicable requirements as tailored to the risks at the Laboratory,
c) correlates and compares SLAC's Safeguards and Security Program and Site Security Plan with the CRD of this Order, and
d) documents recurring deliverables* and DOE-approved methods of compliance for applicable requirements.

Impact on the Contract:
Under the SCP, sections of the Order are incorporated into the Contract as-is, unless the SCP indicates that a section or portion thereof is inapplicable, or the section has been changed. Thus, for example, if "in compliance" is listed next to a section, that section is incorporated into the Contract as-is. However, where an SCP indicates that a section or portion thereof is inapplicable, the section or portion thereof is excluded from the Contract. In addition, where a section or portion thereof is applicable, but changes to the section have been agreed by the Parties, the section, as modified by the Parties, shall be incorporated into the Contract. The SCP also memorializes the Parties' agreement on how SLAC will comply with sections of the Order (whether or not modified).

*Deliverables: Data delivered to DOE or other external agency (e.g., recurring reporting, external database entries)

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**Attachment 1 – Contractor Requirements Document**

| § | Requirement from Attachment 1 – CRD | Compliance Status | Method of Compliance | Deliverables* | | | |
|---|---|---|---|---|---|---|---|
| | | | | Item | Frequency | Due Date(s) | Recipient (e.g., BASO) |
| 1 | GENERAL REQUIREMENTS | | | | | | |
| 1.a | Ensure compliance with privacy requirements, specifically those provided in the Privacy Act of 1974, as amended at Title 5 United State Code (U.S.C.) 552a, and take appropriate actions to assist DOE in complying with Section 208 of the E-government Act of 2002, and associated Office of Management and Budget (OMB). | In compliance | SLAC HR has established PII protocols and procedures that are implemented site wide | N/A | N/A | N/A | N/A |
| 1.b | Ensure that contractor employees are aware of their responsibility for- (1) safeguarding Personally Identifiable Information (PII); (2) reporting suspected or confirmed breach of PII; and (3) complying with the Privacy Act, when required. | In compliance | Same as above | N/A | N/A | N/A | N/A |
| 2 | SPECIFIC REQUIREMENTS | | | | | | |
| 2.a | Ensure contractor employees are aware of their roles and responsibilities for reporting suspected or confirmed breach of PII. | In compliance | Same as above | N/A | N/A | N/A | N/A |

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| 2.b | Ensure contractor employees are cognizant of the following DOE Privacy Rules of Conduct. At a minimum, ensure contractor employees:<br><br>(1) Are trained in their responsibilities regarding the safeguarding of PII.<br><br>(2) Do not disclose any PII contained in any SOR except as authorized.<br><br>(3) Report any suspected or confirmed breach of PII involving Federal information, without unreasonable delay, consistent with agency's breach response procedures outlined in DOE O 206.1 and US-CERT notification guidelines.<br><br>(4) Assist with the investigation and mitigation of harm (including necessary PII removal or encryption within the IT system, notifications, credit monitoring, and other appropriate measures) following a breach of PII involving Federal information under the custody of the contractor.<br><br>(5) Observe the requirements of DOE directives concerning marking and | In compliance | Same as above | N/A | N/A | N/A | N/A |

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| | safeguarding sensitive information, including, when applicable, DOE O 471.3, Identifying and Protecting Official Use Only Information, current version.<br><br>(6) Collect only minimum PII necessary for the proper performance of a documented agency function.<br><br>(7) Do not place PII on Shared drives, intranets, or websites without permission of the System Owner.<br><br>(8) Challenge anyone who asks to see the PII for which they are responsible. | | | | | | |
| 2.c | Ensure that contractor employees complete an Annual Privacy Awareness Training that includes the requirements of DOE O 206.1 and sign the completion certificate acknowledging their responsibility for maintain and protection Privacy Act information prior to being authorized access to all information systems. | In compliance | Same as above | N/A | N/A | N/A | N/A |
| 2.d | Ensure contractor employees are cognizant of the fact that PII subject to the requirements of the Privacy Act must be maintained in a Privacy | In compliance | Same as above | N/A | N/A | N/A | N/A |

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| | ACT SOR. | | | | | | |
| 2.e | Ensure that contractor employees recognize differences between PII and the Privacy Act and the different obligations created by both authorities. Most personal information about an individual will fall under both Privacy Act and OMB directives governing the safeguarding of PII. However, contractors must be cognizant that these are two separate authorities that impose different responsibilities on federal and contractor employees for safeguarding information. PII that is in a SOR is subject to the restrictions and penalties of the Privacy Act, PII not maintained in a Privacy ACT SOR should be protected and only disclosed for authorized purposes. | In compliance | Same as above | N/A | N/A | N/A | N/A |
| 2.f | Ensure contractor employees are cognizant of the fact that non-compliance with the Privacy Act carries criminal and civil penalties. | In compliance | Same as above | N/A | N/A | N/A | N/A |
| 3 | DOE FACILITIES | | | | | | |
| 3.a | Access control decisions are based on risk management principles as required by DOE O 473.3, Protection | In compliance | SLAC has an approved Site Compliance Plan (SCP) for 473.3 and has created an SCP for 470.4B. | N/A | N/A | N/A | N/A |

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| | Program Operations dated 6-29-11 and DOE O 470.4B, Safeguards and Security Program, dated 7-21-11, or their successors. | | | | | | |
| 3.b | Contractors must recognize the following credentials as an acceptable credential for verifying a person's identity as part of the site's physical access procedure: | In Compliance | SLAC currently has limited amount of HSPD-12 badges issued to SLAC employees and DOE employees working at SLAC. | N/A | N/A | N/A | N/A |
| 3.b.1 | An HSPD-12 Credential for DOE employees and contractor employees; | In compliance | SLAC currently has limited amount of HSPD-12 badges issued to SLAC employees and DOE employees working at SLAC. | N/A | N/A | N/A | N/A |
| 3.b.2 | An HSPD-12 Credential for Federal employees and contractors employees from other government agencies; and | In compliance | SLAC has limited number of HSPD-12 credentials from other agencies. | N/A | N/A | N/A | N/A |
| 3.b.3 | A PIV-I credential. | In compliance | SLAC has 80 employees that have a PIV-I badge. | N/A | N/A | N/A | N/A |
| 3.c | Automated access control system should obtain authoritative data from DOE employees contractor employee external to the site from EIMS offered by DOE. | In compliance | SLAC has internal data systems used for access control system. | N/A | N/A | N/A | N/A |
| 3.d | DOE O 473.3 contain requirement for access control systems. | In compliance | SLAC has an approved SCP for O 473.3. | N/A | N/A | N/A | N/A |

(end CRD)

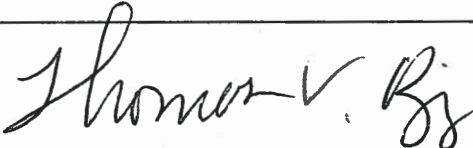*Deliverables:  Data delivered to DOE or other external agency (e.g., recurring reporting, external database entries)

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## Approvals

| Name | Title | Signature | | Date |
|------|-------|-----------|---|------|
| Jonathan Russell | Chief Information Officer, SLAC | | *Electronically signed by: Jonathan Russell* <br> *Reason: I am approving this document.* <br> *Date: Feb 12, 2021 12:17 PST* | 2/ 12 /2021 |
| Thomas V. Rizzi | Division Director of Operations, BASO | | | 2/ 16 /2021 |
| Paul Golan | Head of Field Element, BASO | | | 2/ 16 /2021 |

**Please return signed document to Contract Management.**

## Revision History

| Revision | Revision Date | Summary of Change(s) |
|----------|---------------|----------------------|
| R0 | 2/11/2021 | Original release. |