

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			
Date	24/Jun/09		
Departmental Element & Site	Idaho National Laboratory Information Operations and Research Center (IORC)		
Name of Information System or IT Project	INL Education Programs Business Enclave		
Exhibit Project UID	Exhibit Project UID NA		
New PIA Update X	DOE PIA - INL Education Program Final Ixw.doc		
	Name, Title	Contact Information Phone, Email	
System Owner	Melinda Hamilton Manager, Education Programs	208-526-0948 Melinda.Hamilton@inl.gov	
Local Privacy Act Officer	Dale Claflin Privacy Act Officer	208-526-1199 Dale.Claflin@inl.gov	





MODULE I – PRIVACY NEEDS ASSESSMENT			
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Daniel Jones Technical Lead, Cyber Security	208-526-6477 Daniel.Jones@inl.gov	
Person Completing this Document			
Purpose of Information System or IT Project	The primary objective of the INL's Education and Research Initiative program is to provide strategic leadership in educational and laboratory-directed research activities. INL educational programs work with students over the entire education continuum to ensure a future workforce that will continue the long-term mission of INL.		
Type of information Collected or Maintained by the System:	INL. SSN Medical & Health Information Financial Information Clearance Information Clearance Information Mother's Maiden Name		
Has there been any at system?	tempt to verify PII does not exist on the	Yes	





MODULE I – PRIVACY NEEDS ASSESSMENT

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 Pil? (e.g. system scan)	Manual validation was provided by the Data Services group. Additionally, when performing the Privacy Impact Assessment information was verified.
Threshold Questions	
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 ☐ Federal Employees ☑ Contractor Employees

If the answer to <u>all</u> 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.



MODULE I - PRIVACY NEEDS ASSESSMENT

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?

DOE Contract Number DE-AC07-05ID14517.

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."

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)?

Unless required for employment, input is voluntary.

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? No contractors are involved with the design, development and maintenance of the system.





	MODULE II – PII SYSTEMS & PROJECTS		
4.	IMPACT ANALYSIS: How does this project or information system impact privacy?	Use of this system would impact the individual's privacy if there were a theft or other illegal act – this could subject the individual to unwanted solicitations.	
5.	How will the data be retrieved? Can Pil 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 can be retrieved by name, S number, SSN	
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-05	
7.	SORNs If the information system is being modified, will the SORN(s) require amendment or revision?	NO	
· · · ·	TA SOURCES What are the sources of information about individuals in the information system or project?	Each Individual provides the information for this system.	





MODULE II – PII SYSTEMS & PROJECTS		
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 Pil be used?	Only name, employment history and phone number are used for selection and contact for hiring purposes.	
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?	No other Federal agencies; tribal, state or local government entity; or third parties will share this information.	
Reports		
14. What kinds of reports are produced about individuals or contain an individual's data?	Full data print out	
15. What will be the use of these reports?	Information will be used to determine an employment offer basis	
16. Who will have access to these reports?	System administrator (all information) and intern mentors (only access to name, phone, address, and employment information).	
Monitoring		





MODULE II – PII SYSTEMS & PROJECTS		
17. Will this information system provide the capability to identify, locate, and monitor individuals?	This system will not have the capability to identify, locate, or monitor individuals.	
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A	
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A	
DATA MANAGEMENT & MAINTE	NANCE	
20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include Pill data collected from sources other than DOE records.	Annual review/updates are performed to ensure the data is current.	
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	This system is not operated in more than one site.	
Retention & Disposition	<u>and the state of </u>	
22. What are the retention periods of data in the information system?	The retention period is 75 years.	
23. What are the procedures for disposition of the data at the end of the retention period?	Procedures are documented in the Records Retention Schedule and established in accordance with approved DOE records schedules.	
ACCESS, SAFEGUARDS & SECUR	ITY	





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MODULE II – PII SYSTEMS & PROJECTS		
24. What controls are in place to protect the data from unauthorized access, modification or use?	The INL has implemented controls per the DOE's Program Cyber Security Plan Version 1.2 and continues to operate within the guidance of the PCSP. This system is included in the Business Enclave, which is categorized as moderate, and was certified and accredited December 19, 2007.	
25. Who will have access to Pil data?	System administrator, potential interns (only to their own data, not others') and their mentors.	
26. How is access to PII data determined?	Need to know and User ID and Password	
27. Do other information systems share data or have access to the data in the system? If yes, explain.	No other information systems share data or have access to the data in this system.	
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	
29. Who is responsible for ensuring the authorized use of personal information?	System Manager	
	END OF MODULE II	



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