

PRIVACY IMPACT ASSESSMENT: Occupational Medicine - Assistant

PIA Template Version 3 – May, 2009

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	June 10, 2009		
Departmental Element & Site			
Name of Information System or IT Project	I I JAAN INSTITUTAL RIAGINAA AA		
Exhibit Project UID	Indirect funded Occupational Safety and Health		
New PIA X Update			
	Name, Title	Contact Information Phone, Email	
	Lisa Edelmayer,	208-526-2692	
System Owner	Technical Lead, Occupational Medicine Assistant Employees	Lisa.Edelmayer@inl.gov	
Local Privacy Act Officer	Dale Claflin Privacy Act Officer	208-526-1199 Dale.Claflin@inl.gov	





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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	John Brabec Occupational Medicine Office Manager	(208) 526-0024 John.Brabec@INL.gov	
Purpose of information System or IT Project	To generate and randomize INL drug screen candidates for Federal mandated drug screen programs and maintain results history. Interface tool between Quest Diagnostics Laboratory (analytical lab) and BEA for drug screen results.		
Type of Information Collected or Maintained by the System:	Diagnostics Laboratory (analytical lab) and BEA for drug screen results. SSN Medical & Health Information Financial Information Clearance Information Biometric Information Mother's Maiden Name		
Has there been any at system?	tempt to verify PII does not exist on the	YES	
DOE Order 206.1, Depai	tment of Energy Privacy Program, defines Pli as		





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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. Manual validation was provided by If "Yes," what method was used to verify the system did not the Data Services group. contain PII? (e.g. system scan) Additionally, when performing the **Privacy Impact Assessment** information was verified Threshold Questions 1. Does system contain (collect and/or maintain), or plan to Yes contain any information about individuals?

Yes, it contains former employee information about individual Members of the Public?

Yes, it contains former employee information and potential new hire drug screens.

2. Is the information in identifiable form?

4. Is the information about DOE or contractor employees?

Yes

YES

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





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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?

In support of a drug free workplace and to comply with 49 CFR 40, 10 CFR 707, and 10 CFR 712.

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)?

Individual must provide a social security number or company S number and name. If not provided for tracking purposed this would be determined to be a failure to test for drug screening purposes.





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	MODULE II – PII SYSTEMS & PROJECTS		
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, procurement includes a privacy statement in our contracts.	
4.	IMPACT ANALYSIS: How does this project or information system impact privacy?	Information is very limited and only used to validate illegal drug use and provide tool to randomize drug screen candidate testing; used internally to the company.	
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 can be retrieved by name, 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-33	

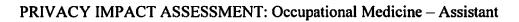




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MODULE II – PII SYSTEMS & PROJECTS		
7. SORNs If the information system is being modified, will the SORN(s) require amendment or revision?	NO	
DATA SOURCES		
8. What are the sources of information about individuals in the information system or project?	Individual-provided; lab drug screen results	
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, supplier has a disk available.	
DATA USE		
11. How will the Pil be used?	Used to determine current individuals in pool and past drug test results.	
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?	BEA security receives reports of who is in pool to validate need to be in or out of pool.	
Reports		

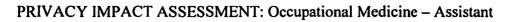






MODULE II – PII SYSTEMS & PROJECTS		
14. What kinds of reports are produced about individuals or contain an individual's data?	Drug screen history report and list of individuals in drug screen pool.	
15. What will be the use of these reports?	To determine who should be in pools and out of pools and allow for random selection of drug screen candidates.	
16. Who will have access to these reports?	Drug screen administrator and Security TDP administrator.	
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	
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 Pil data collected from sources other than DOE records.	Some data is historical on past employees and does not require updating. Current drug screen pool candidates are evaluated monthly by Security to determine who should be in and out of pools.	
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	Operated only at INL.	
Retention & Disposition	<u> </u>	







MODULE II – PII SYSTEMS & PROJECTS		
22. What are the retention periods of data in the information system?	Occupational Medicine will retain negative drug test results, for a minimum of 3 years from completion of testing. Occupational Medicine will retain all records relating to positive drug test results for a minimum of 5 years after employee terminates employment.	
23. What are the procedures for disposition of the data at the end of the retention period?	Disposition of all information follows company and federal record retention and disposition policies and procedures.	
ACCESS, SAFEGUARDS & SECUR	ITY	
24. What controls are in place to protect the data from unauthorized access, modification or use?	Access to system is password protected; only the drug screen administrator and Security TDP administrator have access.	
25. Who will have access to PII data?	Only the drug screen administrator and Security TDP administrator have access.	
26. How is access to Pil data determined?	By need to know, and request to drug screen administrator.	
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?	Quest Diagnostics Laboratory contract has PII procurement clause in contracting language.	
29. Who is responsible for ensuring the authorized use of personal information?	System owner and drug screen administrator.	
	END OF MODULE II	



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