

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 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**

<b>Date</b>	October 14, 2009	
<b>Departmental Element &amp; Site</b>	Office of Environmental Management Department of Energy – Savannah River Operations Office	
<b>Name of Information System or IT Project</b>	WSI-Savannah River Site (SRS) Training Automated Records Management System (TARMS)	
<b>Exhibit Project UID</b>	UPI Code: 019-10-01-15-01-1057-00	
<b>New PIA Update</b>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	Wanda Barr, Mgr. Training and Academic Support	(803) 952-7507 <a href="mailto:wanda.barr@srs.gov">wanda.barr@srs.gov</a>
<b>Local Privacy Act Officer</b>	Pauline Conner, Privacy Act Officer	(803) 952-8134 <a href="mailto:pauline.conner@srs.gov">pauline.conner@srs.gov</a>
<b>Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)</b>	Pamela Livingston-Spruill, Security Manager, WSI-SRS	(803) 952-7634 <a href="mailto:P.Livingston-Spruill@srs.gov">P.Livingston-Spruill@srs.gov</a>

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 PIA Template Version 3 – May, 2009

## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Person Completing this Document</b>	Pauline Conner, Privacy Act Officer	(803) 952-8134 <a href="mailto:pauline.conner@srs.gov">pauline.conner@srs.gov</a>
<b>Purpose of Information System or IT Project</b>	The primary purpose of the WSI-SRS TARMS is to document and maintain protective force firearms and other required training program information, maintain the fitness for duty tests of contractor employees, and capture weapons incentive pay.	
<b>Type of Information Collected or Maintained by the System:</b>	<input checked="" type="checkbox"/> SSN Social Security number <input checked="" type="checkbox"/> Medical & Health Information e.g. blood test results <input checked="" type="checkbox"/> Financial Information e.g. credit card number <input checked="" 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 checked="" type="checkbox"/> DoB, Place of Birth <input checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Passport Number	
<b>Has there been any attempt to verify PII does not exist on the system?</b>  DOE Order 206.1, <i>Department of Energy Privacy Program</i> , 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.	No  System contains PII.	
<b>If "Yes," what method was used to verify the system did not</b>	N/A	

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 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 PIA Template Version 3 – May, 2009

**MODULE I – PRIVACY NEEDS ASSESSMENT**

contain PII? (e.g. system scan)	
<b>Threshold Questions</b>	
<b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b>	YES
<b>2. Is the information in identifiable form?</b>	YES
<b>3. Is the information about individual Members of the Public?</b>	NO
<b>4. Is the information about DOE or contractor employees?</b>	YES  <input 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**

**MODULE II – PII SYSTEMS & PROJECTS**

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 PIA Template Version 3 – May, 2009

## 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>42 U.S.C. [United States Code] 7101 <i>et seq.</i>; and 50 U.S.C. 2401 <i>et seq.</i></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>Collection of the information in the TARMS is required to document and maintain protective force firearms and other required training program information and to maintain the fitness for duty tests of contractor employees.</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. Contractors are involved in the configuration, implementation, and maintenance of the system. Personal information may be disclosed to these contractors and their officers and employees in performance of their contracts. Those individuals provided this type of information is subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.</p> <p>Pertinent 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 that they may obtain in accordance with the provisions of the Privacy Act and the requirements of the DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.</p>
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>N/A</p>

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 PIA Template Version 3 – May, 2009

**MODULE II – PII SYSTEMS & PROJECTS**

<p><b>5. SORNs</b></p> <p><b>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</b></p> <p><b>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</b></p>	<p>Yes. The WSI-SRS TARMS can retrieve data by using name and a unique employee site identification code.</p>
<p><b>6. SORNs</b></p> <p><b>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</b></p> <p><b>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</b></p>	<p>Yes. DOE-31, "Firearms Qualification Records;" and DOE-77, "Physical Fitness Test Records"</p> <p>Federal Register Vol. 74, No. 6/Friday, January 9, 2009 (pages 1030-1032, and 1078-1080)</p>
<p><b>7. SORNs</b></p> <p><b>If the information system is being modified, will the SORN(s) require amendment or revision?</b></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>The TARMS collects fitness for duty qualifications and schedules, training courses, and tests. TARMS collects certain Personally Identifiable Information (e.g., name, social security number, assignment data, etc.) from the WSI-SRS Human Resources and Payroll system.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>No</p>

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 PIA Template Version 3 – May, 2009

**MODULE II – PII SYSTEMS & PROJECTS**

<b>10. Are the data elements described in detail and documented?</b>	Yes. The data dictionary describes and documents the data elements.
<b>DATA USE</b>	
<b>11. How will the PII be used?</b>	The authorized employees will use the PII contained in WSI-SRS TARMS to document and maintain protective force firearms and other required training program information and to maintain the fitness for duty tests of contractor employees.
<b>12. If the system derives meta data, how will the new or meta data be used?</b>  <b>Will the new or meta data be part of an individual's record?</b>	N/A
<b>13. With what other agencies or entities will an individual's information be shared?</b>	No other agencies or entities will share the individual's information.
<b>Reports</b>	
<b>14. What kinds of reports are produced about individuals or contain an individual's data?</b>	The authorized user can generate a variety of reports that include the individual's annual qualification scores, approvals of arming authority and issue of Security Police Officer and Federal Officer Credentials, and firearms accountability. In addition, the authorized user can generate annual firearms qualification scores, fitness for duty qualifications, training topics encompassed by an Annual Training Plan, and individual's ability to complete the physical fitness test as set forth in applicable DOE directives.
<b>15. What will be the use of these reports?</b>	The use of the data is relevant and necessary for the armed uniformed officers to continue to protect the employees at the Savannah River Site. Furthermore, the appropriate local, state and federal agencies will use certain records maintained in the WSI-SRS TARMS to ensure Departmental compliance with other regulatory requirements.

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 PIA Template Version 3 – May, 2009

**MODULE II – PII SYSTEMS & PROJECTS**

<p><b>16. Who will have access to these reports?</b></p>	<p>Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, state and federal agencies may have access to the records maintained in the WSI-SRS TARMS to ensure Departmental compliance with other regulatory requirements.</p>
<p><b>Monitoring</b></p>	
<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>No. The WSI-SRS TARMS does not have the capability to identify, locate, and monitor individuals.</p>
<p><b>18. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>DATA MANAGEMENT &amp; MAINTENANCE</b></p>	
<p><b>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.</b></p>	<p>WSI-SRS TARMS collects basic data directly from the individual to whom it pertains. Therefore, it is determined that the information is accurate, timely and complete at the time it was provided.</p>
<p><b>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</b></p>	<p>The system is licensed and operated at WSI Savannah River Site.</p>
<p><b>Retention &amp; Disposition</b></p>	
<p><b>22. What are the retention periods of data in the information system?</b></p>	<p>Retention periods are in accordance with National Archives and Records Administration (NARA) and DOE records schedules. Information can be obtained at <a href="http://cio.energy.gov/records-management/adminrs.htm">http://cio.energy.gov/records-management/adminrs.htm</a>.</p>

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
 TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
 PIA Template Version 3 – May, 2009

**MODULE II – PII SYSTEMS & PROJECTS**

<b>23. What are the procedures for disposition of the data at the end of the retention period?</b>	Procedures for disposition are documented in applicable NARA and DOE records schedule. Information can be obtained at <a href="http://cio.energy.gov/records-management/adminrs.htm">http://cio.energy.gov/records-management/adminrs.htm</a> .
<b>ACCESS, SAFEGUARDS &amp; SECURITY</b>	
<b>24. What controls are in place to protect the data from unauthorized access, modification or use?</b>	Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include annual training emphasizing that it is the individual's responsibility to protect data that they have access to, and that misuse of that data will not be tolerated. The technical controls include an audit feature that tracks employee actions within the system.
<b>25. Who will have access to PII data?</b>	Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, and state and federal agencies will use certain records maintained in the WSI-SRS TARMS to ensure Departmental compliance with other regulatory requirements. Access to or use of the information provided will be limited to authorized individuals for required management and reporting.
<b>26. How is access to PII data determined?</b>	The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals.
<b>27. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	Yes. The WSI-SRS Human Resources and Payroll populates certain fields to allow changes in work assignments and maintains other information.
<b>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?</b>	The primary information system access agreement at SRS is the Code of Conduct. A Nondisclosure Agreement (NDA) is initially required for all employees and addresses information disclosure. The NDA is maintained in the employee file. An Ethics & Conflict of Interest agreement is required initially for all employees and is updated by appropriate HR division annually and/or when deemed necessary.
<b>29. Who is responsible for ensuring the authorized use of personal information?</b>	System Owner; Information and Personnel Security Department Manager; Information and Resources Management Department, Manager.

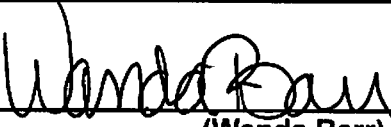
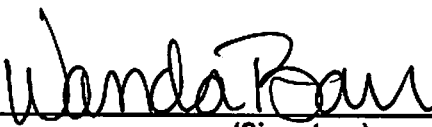
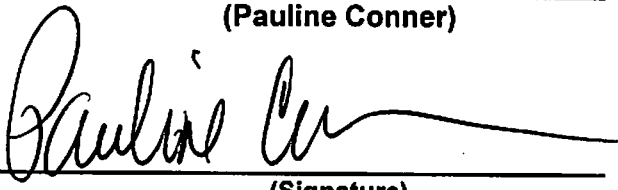

**END OF MODULE II**





PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM  
TRAINING AUTOMATED RECORDS MANAGEMENT SYSTEM  
PIA Template Version 3 – May, 2009

**SIGNATURE PAGE**

	Signature	Date
<b>System Owner</b>	 _____ (Wanda Barr)	
	 _____ (Signature)	<u>11/02/09</u>
<b>Local Privacy Act Officer</b>	_____ (Pauline Conner)	
	 _____ (Signature)	<u>11/4/2009</u>
<b>Jerry Hanley Chief Privacy Officer</b>	_____ 	<u>11/05/09</u>
<b>Ingrid Kolb Senior Agency Official for Privacy (SAOP)</b>	_____	_____