Department of Energy

Privacy Impact Assessment (PIA)

Affects Members Of the Public?	X

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	16/Jun/09
Departmental Element & Site	Idaho National Laboratory Engineering Research Office Building (EROB)
Name of Information System or IT Project	Integrated Safety Management Workshop Registration
Exhibit Project UID	207765
New PIA ☐ **Update** ☒	DOE PIA - ISMS Workshop Final lxw.doc

	Name, Title	Contact Information Phone, Email
System Owner	Theron McGriff, Technical Lead Integrated Safety Management System	208-526-9859 Theron.McGriff@inl.gov
Local Privacy Act Officer	Dale Claflin, Privacy Act Officer	(208) 526-1199 Dale. Claflin@inl.gov
Cyber Security Expert reviewing this	Daniel Jones, Technical Lead Cyber Security	(208) 526-6477 Daniel.Jones@inl.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

document (e.g. ISSM, CSSM, ISSO, etc.)		
Person Completing this Document	Theron McGriff, Technical Lead Integrated Safety Management System	208-526-9859
Purpose of Information System or IT Project	Registration and on-line payment web site for Integrated Safety Management Workshops.	
Type of Information Collected or Maintained by the System:	☒ SSN Social Security number ☐ Medical & Health Information e.g. blood test results ☐ Financial Information e.g. credit card number ☒ Clearance Information e.g. "Q" ☐ Biometric Information e.g. finger print, retinal scan ☐ Mother's Maiden Name ☐ DoB, Place of Birth ☒ Employment Information ☐ Criminal History ☒ Name, Phone, Address ☐ Other – Please Specify	
Has there been any attempt to verify PII does not exist on the system? **DOE Order 206.1,** *Department of Energy Privacy Program,* **defines PII as** *any information collected or maintained by the Department about an individual,*	YES	

MODULE I – PRIVACY NEEDS ASSESSMENT

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 PII? (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

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?	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 No: 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)?**	If the users decline to enter the data required to register for the conference, they will NOT be registered.
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

MODULE II – PII SYSTEMS & PROJECTS	
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	The data maintained on this system has the same potential to impact an individual's privacy as would the loss of similar data from any public, private, government, or other system if not properly safeguarded.
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, address,
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-51
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?	Data is provided by the individual

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, Integrated Safety Management Workshop Registration data dictionary

DATA USE	
11. How will the PII be used?	PII will be used for ISMS Workshop attendance items, i.e., lists, mailing, etc.
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?	None

Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	All information supplied by the user can be printed out in reports as needed to meet the registrant's needs.
15. What will be the use of these reports?	Reports will be used for workshop host and administrators.
16. Who will have access to these reports?	ISMS Workshop Host ISMS Workshop Administrator ISMS Workshop Database Administrator

Monitoring

MODULE II – PII SYSTEMS & PROJECTS

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 & 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.	N/A. The data is only be used for this conference.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A

Retention & Disposition

22. What are the retention periods of data in the information system?	Data removed from system 3 months after the end of the conference.
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 & SECURITY

MODULE II – PII SYSTEMS & PROJECTS

24. What controls are in place to protect the data from unauthorized access, modification or use?	Administrative controls, database logging, and need to know.
25. Who will have access to PII data?	ISMS Workshop Host ISMS Workshop Administrator ISMS Workshop Database Administrator
26. How is access to PII data determined?	Access is determined on a need to know basis; example, users that are registered for the conference will have access only to their information. Each user must use his or her individual account and password.
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?	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	