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	June 11, 2009
Departmental Element & Site	Idaho National Laboratory Building 616 Willow Creek Building
Name of Information System or IT Project	Energy Employees' Occupational Illness Compensation Program Act (EEOICPA) Tracking Database
Exhibit Project UID	78226
New PIA [X] **Update** [ ]	

	Name, Title	Contact Information Phone, Email
System Owner	Lynn Rockhold Project Manager, INL Energy Employees' Occupational Illness Compensation Program	(208) 526-1768 Lynn.Rockhold@inl.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Dale Claflin Privacy Act Officer	(208) 526-1199 Dale.Claflin@inl.gov
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	Lynn Rockhold Project Manager, INL Energy Employees' Occupational Illness Compensation Program	(208) 526-1768 Lynn.Rockhold@inl.gov
Purpose of Information System or IT Project	The EEOICPA Tracking Database is strictly an internal system with access controls. The system tracks the progress of the three types of claims in the Program: (1) Subtitle B- Employment Verification, (2) Subtitle B – Dose Reconstruction and (3) Subtitle E-Toxic Exposure. The database is used on a daily basis to status the stage of completion of EEOICPA claims.	
Type of Information Collected or Maintained by the System:	☒ SSN ☐ Medical & Health Information ☐ Financial Information ☐ Clearance Information ☐ Biometric Information ☐ Mother's Maiden Name ☐ DoB, Place of Birth ☐ Employment Information	

MODULE I – PRIVACY NEEDS ASSESSMENT

	☐ Criminal History ☒ Name ☐ 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, 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.*	N/AYes
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.N/A

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 **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 I – PRIVACY NEEDS ASSESSMENT

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

AUTHORITY, IMPACT & NOTICE

1. **AUTHORITY** **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	The Energy Employees' Occupational Illness Compensation Program Act (EEOICPA), a Congressional Act Executive Order 13179 — Providing Compensation to America's Nuclear Weapons Workers Public Law 106-398, the Energy Employees Occupational Illness Compensation Program Act of 2000

MODULE II – PII SYSTEMS & PROJECTS

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)?**	N/A Information (i.e., Social Security Number) is required by Department of Labor (DOL), the Administrator of the EEOICPA. The INL receives this PII from the agency, not the individual.
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
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	If the system was tampered with and the information was accessed by an unauthorized user or was not destroyed properly, upon meeting the disposition authority, it could compromise the claimant's Social Security Number.
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.**	YES The information can be retrieved from the EEOICPA Tracking Database by Name or Social Security Number.

MODULE II – PII SYSTEMS & PROJECTS

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.*	YES. DOE-05
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?	The information is provided to the Idaho National Laboratory by Regional EEOICPA Resource Centers, a DOL District Claims Office, by the National Institute of Occupational Safety & Health (NIOSH), by the Department of Energy (DOE)-Chicago Office or by the DOE-Grand Junction Office.
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?	N/A

DATA USE

11. How will the PII be used?	It links the correct claimant to the various employment history records searched (i.e., verify name and Social Security Number).

MODULE II – PII SYSTEMS & PROJECTS

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?	It will be shared with DOL, NIOSH, DOE-HQ, DOE-Chicago, DOE-Idaho and/or Subcontractor HR Departments

Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Non-PII reports. The only reports that are produced are for monthly status reporting purposes. There is no PII in the reports – only quantities of claims received and completed.
15. What will be the use of these reports?	To determine quantities claims received and completed.
16. Who will have access to these reports?	N/A – No PII information in the reports.

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 & MAINTENANCE

MODULE II – PII SYSTEMS & PROJECTS

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 - There is no need to keep the information current, as the claim is a one-time effort, not an on-going effort.
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 – No other site utilizes the INL EEOICPA Tracking Database.

Retention & Disposition

22. What are the retention periods of data in the information system?	Delete when the record custodian determines they are no longer needed for administrative, legal, audit, or other operational purposes (Disposition Authority A20-4).
23. What are the procedures for disposition of the data at the end of the retention period?	The EEOICPA Tracking Database will be retired when it is no longer needed to support the Program and/or the EEOICPA is terminated by Congress.

ACCESS, SAFEGUARDS & SECURITY

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 vVersion 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. ~~The System Owner has implemented a Software Management Plan, which identifies access controls. The access controls have been tested to mitigate risk.~~

MODULE II – PII SYSTEMS & PROJECTS

25. Who will have access to PII data?	The INL EEOICPA Project Manager, 2 Claims Processors and 1 Organization Administrator have access. This is listed in Idaho National Laboratory Software Management Plan, PLN-1080, Rev. 1, July, 2008.
26. How is access to PII data determined?	The Project Manager and Claims Processors need to have access to track the processing of the claims. The Organization Administrator needs to have access to assist with technical difficulties.
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?	The INL EEOICPA Project Manager is responsible.

END OF MODULE II

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