



PRIVACY IMPACT ASSESSMENT: INL E-IDR (Invention Disclosure Record)
PIA Template Version 3 – May, 2009

Affects Members Of the Public?	<input checked="" type="checkbox"/>
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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	6/10/09
Departmental Element & Site	Idaho National Laboratory Building: 654 Building Name: EROB
Name of Information System or IT Project	E-IDR (Invention Disclosure Record)
Exhibit Project UID	61104
New PIA <input checked="" type="checkbox"/>	
Update <input type="checkbox"/>	

Name, Title		Contact Information Phone, Email
System Owner	Wendy Skinner	208-526-6928 Wendy.Skinner@inl.gov
Local Privacy Act Officer	Dale Clafin	208-526-1199 Dale.Clafin@inl.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Dan Jones	208-526-6477 DanielJones@inl.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Person Completing this Document	Wendy Skinner	208-526-6928 Wendy.Skinner@inl.gov
Purpose of Information System or IT Project	Collect invention disclosure records.	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify Whether individual is US citizen. Y/N	
Has there been any attempt to verify PII does not exist on the system? <i>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</i>	YES	



MODULE I – PRIVACY NEEDS ASSESSMENT

specific individual.

If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)

Visual inspection by system owner

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 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

<p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<p>Contract DE-AC07-05ID14517 requires BEA to collect IDRs.</p>
<p>2. CONSENT</p> <p>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)?</p>	<p>Data is required to allow BEA Legal to contact inventors and obtain data associated with the IDR.</p>
<p>3. CONTRACTS</p> <p>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?</p>	<p>NO</p>
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>Data is provided by individual. Data is stored on secured server and only released to a limited number of people. Compromise of the system could result in PII being disclosed to those without a need to know.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>5. SORNs</p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>Data can be retrieved by name, address, citizenship.</p>
<p>6. SORNs</p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>DOE-05</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>NO</p>
DATA SOURCES	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Individual provides information.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No</p>



MODULE II – PII SYSTEMS & PROJECTS

10. Are the data elements described in detail and documented?	Yes
DATA USE	
11. How will the PII be used?	Used to allow BEA to contact inventors as necessary in protecting intellectual property.
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?	Department of Energy – Chicago Office
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Hard copy IDR record.
15. What will be the use of these reports?	Required per BEA contract to provide to DOE-CH for evaluation of DOE interest and tracking of inventions under contract.
16. Who will have access to these reports?	BEA and DOE-CH paralegals and attorneys. Outside law firms under contract to work with inventors.
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	Address information would allow someone to be located.



MODULE II – PII SYSTEMS & PROJECTS

18. What kinds of information are collected as a function of the monitoring of individuals?	None; no monitoring occurs.
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.	Individuals are responsible for updating their information.
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?	Retention cut off when patent or copyright permanently expires. Destroy 30 years after cut off.
23. What are the procedures for disposition of the data at the end of the retention period?	Managed in accordance with federal regulations and company procedures (PLN-2854).

ACCESS, SAFEGUARDS & SECURITY

24. What controls are in place to protect the data from unauthorized access, modification or use?	The INL has implement 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 Self Managed Enclave, which is categorized as low, and was certified and accredited January 28, 2008.
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MODULE II – PII SYSTEMS & PROJECTS

25. Who will have access to PII data?	BEA and DOE-CH paralegal and attorneys. Outside law firms under contract to work with inventors.
26. How is access to PII data determined?	On a need-to-know basis in the performance of assigned duties.
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?	EIDR System Owner

END OF MODULE II

SIGNATURE PAGE

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