E1044

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 (INL) Building Number: REC 608 Building Name: IORC
Name of Information System or IT Project	INL PeopleSoft – Human Resource System
Exhibit Project UID	157044
New PIA ☐ **Update** ☒	DOE PIA - Peoplesoft Final.doc

	Name, Title	Contact Information Phone, Email
System Owner	Steven Duff HR Application Trustee, Payroll and Benefits Accounting	208-526-8291 Steven.Duff@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	Steven Duff HR Application Trustee, Payroll and Benefits Accounting	208-526-8291 Steven.Duff@inl.gov
Purpose of Information System or IT Project	The Human Resource System is required to maintain and process employee staffing, benefit and payroll information. The system integrates payroll, personnel/salary administration, benefits administration and personnel recruiting. Modules included in this installation are HR/Base Benefits, Time and Labor, North American Payroll, Candidate Gateway, eCompensation, Talent Acquisiton Management, eCompensation Manager Desktop, Benefits Administration and eBenefits, eProfile, ePay and Pension Administration. Self Service modules put functionality into the hands of end-users, managers and applicants, that were previously restricted to HR professionals. Interfaces are also maintained with other applications within the integrated business system environment. These interface applications include Oracle Financials, The BDSIS Warehouse and the Enterprise Directory.	
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, Phone, Address
	☒ Other – Bank account numbers

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.*	Yes
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

MODULE I – PRIVACY NEEDS ASSESSMENT

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?	Department of Energy Contract No. DE-AC07-05ID14517
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)?	Individuals are required to provide all information except for limited data in the self-identification of the new hire/applicant form (e.g. ethnicity)

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. Yes
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 is retrieved using a personal identifier such as .employee number, employee name or Social Security Number.
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-05

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?	Security Information Management System, individual input, Human Resource input, and Payroll input - the individual provides the majority of the information; employee number is generated from the security system.
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?	The database schema and data element descriptions are available from the software provider since this application is a Commercial Off The Shelf (COTS) product.

DATA USE

11. How will the PII be used?	Information is used by the Payroll and HR departments to facilitate the processing of employee benefits and pay. Access by the Audit department is used to ensure proper classification of employees and accurate processing.
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?	Social Security Administration for validation of Social Security Numbers . Benefits providers (AFLAC, Aetna, John Hancock, Vanguard, etc.)

MODULE II – PII SYSTEMS & PROJECTS

Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Employee time and attendance; benefits enrollment; payroll processing data; paycheck distribution; tax information; garnishment reports; investment reports; short term disability and workers comp reports; dependent statements; insurance premium letters; affirmative action and diversity reports.
15. What will be the use of these reports?	These reports are used to ensure the proper processing of employee information to provide pay, benefit enrollment, regulatory verifications and information
16. Who will have access to these reports?	IF BEA Downloads, IF BEA HR Reporting, IF BEN/HR Reporting, IF Benefit Accounting, IF Benefit Administrator, IF Benefit Superuser IF Benefits Corr - ANDEBL2, IF Benefits Corrections, IF Benefits General, IF CPA Access, IF Counsel, IF Counterintelligence, IF EE View, IF EEO, IF Education, IF HR BEA Generalist, IF HR Base Bene Reports, IF HR Education Access, IF HR Generalist, IF HR Generalist Support, IF HR Managers, IF HR Special, IF HRS IT Functions, IF Hire Interns, IF Labor Relations, IF Manager, IF Pay Approve, IF Pay/Benefit Actions, IF Payroll, IF Payroll 1, IF Payroll 2, IF Payroll Check Print, IF Payroll Special Access, IF Payroll w/o Ck Print, IF Pension Admin, IF Pension Admin Data Entry, IF Pension Benef Report, IF Personnel Actions, IF Staffing, IF Stipend Query, IF Sys Admin Backup, IF Travel Accounting
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.	Employee validation via on-line and paper, application edits, and periodic data reviews
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?	The retention period is 75 years following the death of the individual.
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.

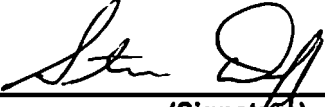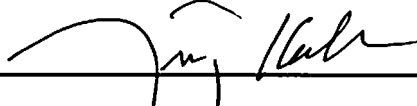| ACCESS, SAFEGUARDS & SECURITY	
24. What controls are in place to protect the data from unauthorized access, modification or use?	User accounts with passwords at both the database and application level are used to restrict access. Periodic reviews of access logs are performed to detect unauthorized access. Modifications are controlled by use of a change control process.
25. Who will have access to PII data?	IF BEA Downloads, IF BEA HR Reporting, IF BEN/HR Reporting, IF Benefit Accounting, IF Benefit Administrator, IF Benefit Superuser IF Benefits Corr - ANDEBL2, IF Benefits Corrections, IF Benefits General, IF CPA Access, IF Counsel, IF Counterintelligence, IF EE View, IF EEO, IF Education, IF HR BEA Generalist, IF HR Base Bene Reports, IF HR Education Access, IF HR Generalist, IF HR Generalist Support, IF HR Managers, IF HR Special, IF HRS IT Functions, IF Hire Interns, IF Labor Relations, IF Manager, IF Pay Approve, IF Pay/Benefit Actions, IF Payroll, IF Payroll 1, IF Payroll 2, IF Payroll Check Print, IF Payroll Special Access, IF Payroll w/o Ck Print, IF Pension Admin, IF Pension Admin Data Entry, IF Pension Benef Report, IF Personnel Actions, IF Staffing, IF Stipend Query, IF Sys Admin Backup, IF Travel Accounting, IF Employee

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26. How is access to PII data determined?	Employees are allowed to view their own data. Other accesses are granted by identified data owners: HR/Benefits and Payroll management based on the need to know in the performance of official duties.
27. Do other information systems share data or have access to the data in the system? If yes, explain.	Yes. Other systems with access to some data within this system are: BDSIS, TRAIN, SQLSERVER, FINANCIALS, OMP, EARCH, MED1, EDMS, ARCHIBUS, PASSPORT, STIPEND, ACL, MBRS, HRBRIDGE, WEBSERV, TIMS, SECIMS, EUC, ERO, EDUCAPP and TASKTRAC.
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?	No
29. Who is responsible for ensuring the authorized use of personal information?	Payroll manager, HR Information Systems manager, HRS Application Trustee.

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
System Owner	Steven Duff (Print Name) *(signature)* (Signature)	6-30-09
Local Privacy Act Officer	Clayton Ogilvie (Print Name) *(signature)* (Signature)	7-9-09
Jerry Hanley **Chief Privacy Officer**	*(signature)*	07/30/09
Ingrid Kolb **Senior Agency Official for Privacy (SAOP)**	*(signature)*	8-14-09