



PRIVACY IMPACT ASSESSMENT: INL Communications and Public
Affairs Tour Tracker 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	24/Jun/09	
Departmental Element & Site	Idaho National Laboratory INL Communications and Public Affairs (Org. #L300)	
Name of Information System or IT Project	Tour Tracker	
Exhibit Project UID	198318	
New PIA <input checked="" type="checkbox"/>		
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Don Miley Technical Lead, INL Communications and Public Affairs Tour Tracker	208-526-5523 Donald.Miley@inl.gov
Local Privacy Act Officer	Dale Clafin Privacy Act Officer	208-526-6477 Dale.Clafin@inl.gov



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MODULE I – PRIVACY NEEDS ASSESSMENT

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	Don Miley Technical Lead, INL Communications and Public Affairs Tour Tracker	208-526-5523 Donald.Miley@inl.gov
Purpose of Information System or IT Project	Web Application that allows people in Communications store/retrieve information about upcoming INL tours. Application also allows people to request an INL tour and allows internal people to see a tour schedule.	
Type of Information Collected or Maintained by the System:	<input checked="" 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 checked="" 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 – Citizenship	
Has there been any attempt to verify PII does not exist on the system?	YES	



MODULE I – PRIVACY NEEDS ASSESSMENT

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.

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 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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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>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>Contract #DE-AC07-051D14517</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>INL Tours have allowed visitors/groups to not submit SSN on the electronic sign-up form, with the understanding that it will be required on the INL Tour Log that is presented to Security at operating facilities. Visitors are allowed to hand-write their SSN on that form when signing it and verifying citizenship.</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>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>The system captures name, SSN, date and place of birth, address, citizenship.</p>
<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, SSN, 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-51</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>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Sources for information are from the individual.</p>



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MODULE II – PII SYSTEMS & PROJECTS

<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>The information system will not derive new or meta data about any individuals.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>The data element descriptions are stored within system tables in the database and can be retrieved by queries of those tables</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>Data is used to produce INL Tour Logs that visitors to INL facilities must sign prior to entry to facilities.</p>
<p>12. If the system derives meta data, how will the new or meta data be used?</p> <p>Will the new or meta data be part of an individual's record?</p>	<p>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>None</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>Tour Logs</p>
<p>15. What will be the use of these reports?</p>	<p>To account for individuals participating in INL tours.</p>
<p>16. Who will have access to these reports?</p>	<p>Communications Dept. and Security personnel with a need to know in the performance of official duties.</p>
<p>Monitoring</p>	



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.	Data is verified with photo id at the time of the tour, security logs are turned over for retention, there is no need to keep the records current. It is collected as a one-time use for preparation of an INL Tour Log if the individual chooses to participate in another INL Tour the data is collected/verified prior to following tours.
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?	Completed tour logs are turned over to INL Security to follow the records management plan found in LWP-1202.
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?	The system was developed outside of INL Communications & Public Affairs, still within the INL, and it is assumed that all baseline security controls appropriate to its FIPS categorization in accordance with the Senior DOE Management PCSP and DOE Directives were completed before being provided to INL C&PA.
25. Who will have access to PII data?	Five INL C&PA employees have access to the system information in the performance of their official duties.
26. How is access to PII data determined?	Access is determined by those that need to prepare INL Tour Logs.
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 Tour Director.

END OF MODULE II

SIGNATURE PAGE

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