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### Module I – Privacy Needs Assessment

<table>
<thead>
<tr>
<th>Date</th>
<th>24/Jun/09</th>
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</thead>
</table>
| 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 | X |
| Update | |

<table>
<thead>
<tr>
<th>Name, Title</th>
<th>Contact Information Phone, Email</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>System Owner</strong></td>
<td>Don Miley</td>
</tr>
</tbody>
</table>
| Technical Lead, INL Communications and Public Affairs Tour Tracker | 208-526-5523  
Donald.Miley@inl.gov |
| **Local Privacy Act Officer**                    | Dale Claflin                                        |
| Privacy Act Officer                              | 208-526-6477  
Dale.Claflin@inl.gov |
### MODULE 1 – PRIVACY NEEDS ASSESSMENT

| Cyber Security Expert reviewing this document (e.g. ISMM, CSSM, ISSO, etc.) | Daniel Jones | 208-526-6477  
| | Technical Lead, Cyber Security | Daniel.Jones@inl.gov |
| Person Completing this Document | Don Miley | 208-526-5523  
| | Technical Lead, INL Communications and Public Affairs Tour Tracker | 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: |  
| ☑ SSN |  
| ☐ Medical & Health Information |  
| ☐ Financial Information |  
| ☐ Clearance Information |  
| ☐ Biometric Information |  
| ☐ Mother's Maiden Name |  
| ☑ DoB, Place of Birth |  
| ☐ Employment Information |  
| ☐ Criminal History |  
| ☑ Name, Phone, Address |  
| ☑ 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?**
   - 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

<table>
<thead>
<tr>
<th>AUTHORITY, IMPACT &amp; NOTICE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. AUTHORITY</strong></td>
</tr>
<tr>
<td>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</td>
</tr>
<tr>
<td>DOE O 206.1, &quot;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.&quot;</td>
</tr>
<tr>
<td>Contract #DE-AC07-05ID14517</td>
</tr>
<tr>
<td><strong>2. CONSENT</strong></td>
</tr>
<tr>
<td>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)?</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td><strong>3. CONTRACTS</strong></td>
</tr>
<tr>
<td>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?</td>
</tr>
<tr>
<td>NO</td>
</tr>
</tbody>
</table>
### MODULE II – PII SYSTEMS & PROJECTS

#### 4. IMPACT ANALYSIS:

**How does this project or information system impact privacy?**

| The system captures name, SSN, date and place of birth, address, citizenship. |

#### 5. SORNs

**How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?**

| Data can be retrieved by name, SSN, address, citizenship. |

If yes, explain, and list the identifiers that will be used to retrieve information on the individual.

#### 6. SORNs

**Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register?**

| DOE-51 |

If "Yes," provide name of SORN and location in the Federal Register.

#### 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?

| Sources for information are from the individual. |
### MODULE II – PII SYSTEMS & PROJECTS

<table>
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<tr>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Will the information system derive new or meta data about an individual from the information collected?</td>
<td>The information system will not derive new or meta data about any individuals.</td>
</tr>
<tr>
<td>10. Are the data elements described in detail and documented?</td>
<td>The data element descriptions are stored within system tables in the database and can be retrieved by queries of those tables</td>
</tr>
</tbody>
</table>

#### DATA USE

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<tr>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>11. How will the PII be used?</td>
<td>Data is used to produce INL Tour Logs that visitors to INL facilities must sign prior to entry to facilities.</td>
</tr>
<tr>
<td>12. If the system derives meta data, how will the new or meta data be used?</td>
<td>N/A</td>
</tr>
<tr>
<td>Will the new or meta data be part of an individual’s record?</td>
<td>None</td>
</tr>
<tr>
<td>13. With what other agencies or entities will an individual’s information be shared?</td>
<td>None</td>
</tr>
</tbody>
</table>

#### Reports

<table>
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<tr>
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<tr>
<td>14. What kinds of reports are produced about individuals or contain an individual’s data?</td>
<td>Tour Logs</td>
</tr>
<tr>
<td>15. What will be the use of these reports?</td>
<td>To account for individuals participating in INL tours.</td>
</tr>
<tr>
<td>16. Who will have access to these reports?</td>
<td>Communications Dept. and Security personnel with a need to know in the performance of official duties.</td>
</tr>
</tbody>
</table>
### 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.
### MODULE II – PII SYSTEMS & PROJECTS

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<th>Answer</th>
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<tr>
<td>24. What controls are in place to protect the data from unauthorized access, modification or use?</td>
<td>The system was developed outside of INL Communications &amp; 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&amp;PA.</td>
</tr>
<tr>
<td>25. Who will have access to PII data?</td>
<td>Five INL C&amp;PA employees have access to the system information in the performance of their official duties.</td>
</tr>
<tr>
<td>26. How is access to PII data determined?</td>
<td>Access is determined by those that need to prepare INL Tour Logs.</td>
</tr>
<tr>
<td>27. Do other information systems share data or have access to the data in the system? If yes, explain.</td>
<td>NO</td>
</tr>
<tr>
<td>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?</td>
<td>N/A</td>
</tr>
<tr>
<td>29. Who is responsible for ensuring the authorized use of personal information?</td>
<td>The INL Tour Director.</td>
</tr>
</tbody>
</table>

**END OF MODULE II**
<table>
<thead>
<tr>
<th>PIA Approval Signatures</th>
<th>Original Copy Signed and On File with the DOE Privacy Office</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td></td>
<td></td>
</tr>
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</table>