

**Department of Energy
Privacy Impact Assessment**

Name of Project: Washington Savannah River Company (WSRC) Badge Request System (BADREQ), Business Applications, Savannah River Site (SRS) Accreditation Boundary
Bureau: Department of Energy -Savannah River Operations Office Project's Unique ID:
UPI Code: 019-10-01-15-01-1057-00
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A. CONTACT INFORMATION:

1) Who are the person(s) completing this document?

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

- 1) **Does this system contain any information about individuals? Yes.**
 - a. **Is this information identifiable to the individual¹? Yes**
 - b. **Is the information about individual members of the public? Yes**
 - c. **Is the information about DOE or contractor employees? Yes.**
- 2) **What is the purpose of the system/application?**

The primary purpose of the BADREQ is to track and control present and former U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), and contractor employees accessing Department facilities and classified information areas. In addition, the BADREQ tracks and controls visitors, subcontractors, and foreign visitors accessing Department facilities. The BADREQ documents, tracks, manages, analyzes, and/or reports on foreign visit and assignment access to DOE facilities including, Field Offices, National Laboratories and Contractor Sites.

- 3) **What legal authority authorizes the purchase or development of this system/application?**

Department of Energy Organization Act of 1977 (42 U.S.C. [United States Code] 7101 et seq.); and Export Administrative Act of 1979 (50 U.S.C. 2401 et seq.)

C. DATA IN THE SYSTEM:

- 1) **What categories of individuals are covered in the system?**

The BADREQ covers former and present DOE, NNSA and contractor employees, and any other persons seeking access to DOE facilities and classified records. In addition, the BADREQ covers all non-U.S. citizens seeking access to DOE facilities, laboratories, contractor sites, or DOE and NNSA sponsored events for unclassified purposes to include employees of DOE or DOE contractors; prospective DOE or DOE contractor employees; employees of other U.S. Government agencies or their contractors of universities, of companies (professional or service staff), or of other institutions, foreign students at U.S. institutions; officials or other persons employed by foreign governments or other foreign institutions who may or may not be involved in cooperation under international agreements; permanent resident aliens; representatives or agents of foreign national governments seeking access to DOE facilities, laboratories, or contractor sites or DOE-sponsored events for purposes of high-level protocol; national security; International Atomic Energy Agency, or international relations.

¹ "Identifiable Form" – According to the OMB Memo M-02-22, this means information in an IT system or online collections: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

2) What are the sources of the information in the system?

- a. Is the source of the information from the individual or is it taken from another source?** The BADREQ collects information from the badge office for all individuals processed through the badging process. The respective personnel systems operated for the companies by whom the individuals are employed provide additional information. In addition, the BADREQ collects information from the individual to whom it pertains. For example, foreign national individuals requesting access to DOE facilities including contractor sites, reports from federal investigation agencies, DOE Office of Counterintelligence, Department of State, Department of Defense (DOE), Immigration and Naturalization Service, and other Government agencies.
- b. What Federal agencies are providing data for use in the system?** DOE, Department of Defense, and other Government agencies.
- c. What Tribal, State, and local agencies are providing data for use in the system?** None
- d. From what other third party sources will data be collected?** None.
- e. What information will be collected from the individual and the public?** The system collects name, social security number (SSN), home address and phone number, gender, place of birth, date of birth, and passport number and passport.

3) Accuracy, Timeliness, and Reliability

- a. How will data collected from sources other than DOE records be verified for accuracy?** Source data is collected directly from the individual to whom it pertains and is assumed to be accurate, timely, and complete at the time it was provided.
- b. How will data be checked for completeness?** Data will be manually and electronically reviewed for completeness. Therefore, the data collected is determined it is complete at the time it was provided.
- c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?** The system collects data directly from the individual to whom it pertains. Therefore, the data collected is determined it is current at the time it was provided. However, information is generally not updated after the individual's relationship with the Site is terminated.
- d. Are the data elements described in detail and documented?** Description of the data elements for BADREQ resides in the documentation for the system.

D. ATTRIBUTES OF THE DATA:

- 1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Yes. All data collected is relevant and necessary to verify an individual's identity. In addition, the use of the data is relevant and necessary to assist the appropriate local, State or Federal agency's investigation of potential violation of law whether civil,

criminal, or regulatory in nature, and whether arising by general statute or particular program. Furthermore, the use of the data is relevant and necessary to contractors, grantees, participants in cooperative agreements, collaborating researchers, or their employees, in performance of national security, international visit and assignment, or foreign access related responsibilities.

- 2) **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

No

- 3) **Will the new data be placed in the individual's record?**

N/A

- 4) **Can the system make determinations about employees/public that would not be possible without the new data?**

N/A

- 5) **How will the new data be verified for relevance and accuracy?**

N/A

- 6) **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

Data is not being consolidated in this system.

- 7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

Processes are not being consolidated.

- 8) **How will data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Yes. The system can retrieve data by using social security number in conjunction with the name of the individual and site computer user id.

- 9) **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

The authorized user can generate a variety of reports that include visit/assignment request information, access to sensitive information, equipment, and property areas, and assist the appropriate local, State or Federal agency's investigation of potential violation of law whether civil, criminal, or regulatory in nature, and whether arising by general statute or particular program. Access to reports is controlled based on need-to-know and the principle of least privilege.

- 10) 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)?**

Collection of the information in the BADREQ is required to be able to issue an identity badge and assist the appropriate local, State or Federal agency's investigation of potential violation of law whether civil, criminal, or regulatory in nature, and whether arising by general statute or particular program. Access to or use of the information provided will be limited to authorized individuals for required management and reporting.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

The system is only operated at SRS.

- 2) What are the retention periods of data in the system?**

Records retention and disposal authorities are contained in the National Archives and Records Administration (NARA) General Records Schedule and DOE record schedules that have been approved by NARA.

- 3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

Procedures are documented in the Records Schedule and established in accordance with NARA General Records Schedule. The data contained in the system will be maintained for the life of the system. When the electronic record associated with that data has met its legal retention, the object will be removed. The data about the record, metadata, will remain, with an indication that the record has been dispositioned. The reports produced by the system will be maintained in accordance with NARA General Records Schedule.

- 4) Is the system using technologies in ways that the DOE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No

- 5) How does the use of this technology affect public/employee privacy?**

N/A

- 6) Will this system provide the capability to identify, locate, and monitor individuals?**

No

7) **What kinds of information are collected as a function of the monitoring of individuals?**

N/A

8) **What controls will be used to prevent unauthorized monitoring?**

N/A

9) **Under which Privacy Act system of records notice does the system operate?**

- DOE-51 Employee and Visitor Access Control Records
- DOE-52 Access Control Records of International Visits, Assignments, and Employment at DOE facilities and Contractor Sites

10) **If the system is being modified, will the Privacy Act system of records notice require amendment or revision?**

No

F. ACCESS TO DATA:

1) **Who will have access to the data in the system?**

Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, state or federal agencies will use certain records maintained in BADREQ to ensure Departmental compliance with other regulatory requirements. Access to or use of the information provided will be limited to authorized individuals for required management and reporting.

2) **How is access to the data by a user determined?**

The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals.

3) **Will users have access to all data on the system or will the user's access be restricted?**

User's access will be restricted based on the need for access to data.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

Administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include limited access based on need to know, annual training emphasizing that it is the individual's responsibility to protect data that they have access to, and that misuse of that data will not be tolerated. The system has the capability to monitor access to the records stored.

- 5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses included in their contracts and other regulatory measures addressed?**

Contractors are involved in the configuration and implementation and maintenance of the system. Personal information may be disclosed to these contractors and their officers and employees in performance of their contracts. Those individuals provided this type of information is subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Pertinent contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need-to-know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and the requirements of the DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.

- 6) Do other systems share data or have access to the data in the system? If yes, explain?**

No

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

The system owner for other systems to have access to data within the BADREQ application must grant permission. Once provided, it is the responsibility of the other system owners to protect the data provided by BADREQ.

- 8) Will other agencies share data or have access to the data in this system?**

No

- 9) How will the data be used by the other agency?**

N/A

- 10) Who is responsible for assuring proper use of the data?**

N/A

PIA Approval Signatures

Original copy signed and on file with the DOE Privacy Office.