

**Department of Energy**  
**Privacy Impact Assessment**

**Name of Project: Washington Savannah River Company (WSRC) Electronic Document Workflow (Records) System (EDWS) Documents and Records System Project Savannah River Site (SRS) Site Applications Accreditation Boundary**  
**Bureau: Department of Energy – Savannah River Operations Office**  
**Project's Unique ID: UPI Code: 019-10-01-15-01-1057-00**  
**Date: August 12, 2008**

**A. CONTACT INFORMATION:**

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

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**2) Who is the system owner?**

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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 individual<sup>1</sup>? 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 EDWS provides mass storage for electronic image and data files for all record types. In addition, the EDWS provides indexing for legacy hardcopy records. For example, the MedGate, PRORAD, and HRMS systems collect and maintain medical, industrial hygiene, safety data, occupational radiation exposure data, payroll, pension, benefits, and human resources data for present and former U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA) and contractor employees, and any other persons having access to certain DOE facilities. In addition, the EEOICPA tracks claims for conditions that may be due to exposures during employment by or for DOE. Furthermore, the EDWS maintains records for use by the Department to document and resolve employee concerns about environment, safety and health issues, employee-supervisor relations, work processes and practices, other work-related issues, etc.

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

Department of Energy Organization Act of 1977 (42 U.S.C. 7101 *et seq.*); Export Administrative Act of 1979 (50 U.S.C. 2401 *et seq.*); The Energy Employees Occupational Illness Compensation Program Act of 2000, Pub. L. 106-398; Atomic Energy Act of 1954 (42 U.S.C. 2051a), section 31a; Economy Act of 1932, as amended (31 U.S.C. 1535); Memorandum of Understanding between the Department of Energy and the Department of Health and Human Services, 56 FR 9701, March 7, 1991; 42 U.S.C. 2201(p); 42 U.S.C. 7254; 42 U.S.C. 5801(a); the General Accounting Office (GAO) Policy and Procedures Manual; Statement of Federal Financial Accounting Standards published by the GAO and the Office of Management and Budget; 50 U.S.C. 301; Debt Collection Improvement Act of 1996; 31 U.S.C. 3512; 5 U.S.C. 5701-09; Federal Property Management Regulations 101-107; Treasury Financial Manual; Executive Order 9397; Department of Energy Organization Act, including authorities incorporated by reference in Title III of the Department of Energy Organization Act; Federal Tort Claims Act, 28 U.S.C. 2671-2680; Military Personnel and Civilian Employees Claims Act, 31 U.S.C. 240-243; Executive Order 12009; 10 CFR part 710, subparts A and B; Executive Orders 10450 and 12968; 5 CFR part 732; DOE O 472.1B; Personnel Security Activities, of 3-24-97; Personnel Security Program Manual DOE M 472-1.1, of 5-22-98; and Director of Central Intelligence Directive 1/14 of 1-22-91; 42 U.S.C. 7151 and 7297; 42 U.S.C.

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<sup>1</sup> "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).

2201(c), 2201(I)(3), 5813 and 5817; 41 U.S.C. 2165; 42 U.S.C. 5814-5815; 3 CFR 1949-1953 as amended; Executive Order 10865; 3 CFR 1959-1963, as amended; and Personnel Assurance Program [10 CFR 712].

**C. DATA IN THE SYSTEM:**

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

The EDWS covers present and former DOE, NNSA, and contractor employees, and any other persons having access to certain DOE facilities, individuals seeking assistance in obtaining compensation for an illness related to exposures during employment by or for DOE. Furthermore, The EDWS covers current and former DOE employees and DOE contractor and subcontractor employees who file concerns file concerns or complaints with the DOE Employee Concerns Program offices, etc.

**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 EDWS collects data from various sources. The EDWS collects information from medical records, personnel security records, exposure records, safety records, incident reports, and employment records, information from the concerned employee or complainant, applicable management officials, program office records, congressional offices, etc. In addition, this system collects information provided by individual or family member to whom it pertains.

**b. What Federal agencies are providing data for use in the system?**

The systems collect information from the DOE, Department of Labor, National Institute for Occupational Safety and Health, and other federal 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 EDWS collects name, social security number, home address and phone number, date of birth, citizenship status, access authorization history, employment history, gender, emergency contact information, medical histories, witness statements, affidavits, creditors name and address, accident/incident information, occupational injury and illness experience, property damage, motor vehicle accidents, credit/consumer reports, and training records.

**3) Accuracy, Timeliness, and Reliability**

- a. **How will data collected from sources other than DOE records be verified for accuracy?**

The EDWS collects data directly from the individual or family member to whom it pertains. Therefore, the data collected is determined it is accurate at the time it was provided.

- b. **How will data be checked for completeness?**

The data in the system is 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 EDWS collects data directly from the individual or family member to whom it pertains. Therefore, the data collected is determined it is current at the time it was provided.

- d. **Are the data elements described in detail and documented?**

The data dictionary describes and documents the data elements.

**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 EDWS data collected is relevant and necessary for continued operation of the activities at the Savannah River Site.

- 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?**

N/A

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

N/A

- 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 EDWS can retrieve data by using name, social security number, 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 medical, industrial hygiene, safety information, human resources, payroll, benefits administration information, and exposure information. Access is limited to those whose official duties require access to the records.

- 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)?**

The individual provides the information voluntarily.

**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 licensed by and operated for DOE-SR.

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

Retention periods are in accordance with applicable DOE and National Archives Records Administration (NARA) record schedules. Additional information can be obtained at <http://cio.energy.gov/records-management/adminrs.htm>.

- 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?**

The data contained in the EDWS systems will be maintained for the life of the system. When the electronic record associated with the data has met its legal retention, the object will be removed. The data about the records, metadata, will remain, with an indication that the record has been dispositioned. The reports produced by the system will be maintained in accordance applicable DOE and National Archives Records Administration (NARA) record schedules. Additional information can be obtained at <http://cio.energy.gov/records-management/adminrs.htm>.

- 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-3 Employee Concerns Program Records  
DOE-5 Personnel Records of Former Contractor Employees  
DOE-10 Energy Employees Occupational Illness Compensation Program Act Files  
DOE-18 Financial Accounting System  
DOE-33 Personnel Medical Records  
DOE-35 Personnel Radiation Exposure  
DOE-38 Occupational and Industrial Accident Records  
DOE-41 Legal Files (Claims, Litigation, Criminal Violations, Patents, and Others)  
DOE-43 Personnel Security Files  
DOE-50 Human Reliability Program Records  
DOE-51 Employee and Visitor Access Control  
DOE-52 Access Control Records of International Visits, Assignments, and Employment at DOE facilities and Contractor Sites  
DOE-88 Epidemiologic and Other Health Studies, Surveys, and Surveillances

**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?**

Access is limited to those whose job responsibility and function require access to records in this system. User-name and password are required to access data. Furthermore, the appropriate local, state or federal agencies will use certain records maintained in EDWS 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?**

Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include annual training emphasizing the individual's responsibility to protect the data they have access to, and misuse of that data will not be tolerated. The technical controls include the ability to track employees' login action with the system.

**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?**

Yes. The site records autoloading utility (AF2EDWS), a subsystem of the Documents and Records System Project, has access to data in the EDWS Oracle Database. Queries in this utility are limited to verifying the uniqueness of a submitted record and verifying the existence of a record within the system.

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

N/A

- 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.*