

Department of Energy
Privacy Impact Assessment

Name of Project: Washington Savannah River Company (WSRC) MedGate Occupational Health and Safety Medical System (OHS) – 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

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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 MedGate Occupational Health and Safety System is to manage medical, industrial hygiene and safety data for present and former U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA) and contractor employees. In addition, the MedGate monitors and records information about DOE employees, contractor employees, and other persons, who have had accidents on DOE facilities. Furthermore, the information contained in MedGate is used and maintained by the Department to conduct epidemiological and other health studies, surveys and surveillances, conducted by the Department and the Department of Health and Human Services performing studies for the Department, their contractors, grantees, and collaborating researchers. Finally, MedGate encompasses historical legacy medical data from the Sentry Warehouse.

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

Atomic Energy Act of 1954 (42 U.S.C. [United States Code] 2051a), section 31a; Economy Act of 1932, as amended (31 U.S.C. 1535); 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.*); Worker Protection Management for DOE Federal and Contractor Employees (DOE Order 440.1); Government Organization and Employees (5 U.S.C. 301); Federal Tort Claims Act (28 U.S.C. 2671-2680); Military Personnel and Civilian Employees Claims Act (31 U.S.C. 240-243); and Department of Energy Organization Act (Executive Order 12009); 42 U.S.C. 7151 and 7297; 42 U.S.C. 2201(c), 2201(I)(3), 5813 and 5817.

C. DATA IN THE SYSTEM:

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

The MedGate OHS covers present and former DOE, NNSA, and contractor employees and any other persons having access to DOE facilities who have had accidents on DOE facilities. In addition, the MedGate OHS covers individuals involved in accident with employees or contractor employees or other persons having access to DOE facilities. Furthermore, MedGate OHS covers individuals who were included in any authorized epidemiologic and other health study, survey, or

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).

surveillance. Such persons include current and former employees of the Department, its predecessor agencies, and their contractors and subcontractors, as well as other individuals included in health studies, surveys, and surveillances pertaining to any potential health hazard (including electromagnetic fields) associated with energy production, transmission, or use.

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 MedGate OHS collects data from various sources. It collects medical results directly from testing equipment, medical questionnaire, incident information related to job injuries/exposures and medical clearances. The MedGate OHS collects accident/incident information, occupational injury and illness experience, property damage experience, and motor vehicle accidents. It also collects information provided by individual to whom it pertains. Examples include, but are not limited to, questionnaires, demographic information, work history,, medical and reproductive history, birth data, radiation and other exposure history, laboratory test results, data from prior studies, surveys, and surveillances, alcohol and tobacco use history, and illness absence information. Information may be extracted as necessary from personnel files and lists, training files, medical records, legal case files, bioassay records, industrial hygiene files, and related sources.
- b. What Federal agencies are providing data for use in the system?** DOE and National Institute of Occupational Safety and Health
- 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 MedGate OHS system collects name, social security number (SSN), home address and phone number, race, gender, date of birth, emergency contact information, and medical histories.

3) Accuracy, Timeliness, and Reliability

- a. How will data collected from sources other than DOE records be verified for accuracy?** The MedGate OHS system collects data directly from the individual 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 MedGate OHS 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?** No. Once the individual departs the Savannah River Site, the data contained in the MedGate OHS system will generally not updated.

d. Are the data elements described in detail and documented? The data elements are described and documented within the vendor-delivered MedGate Data Dictionary.

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 for continued operation of the site Occupational Health and Safety programs.

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 MedGate OHS system can retrieve data by using name, social security number, or the site's computer-generated alternate ID (Comp_Alt_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, and safety information. Reports are used for management and administration, as well as federal and state reporting requirements. 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 MedGate OHS system is required to be able to provide appropriate levels of monitoring and reporting certain categories of employee. 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 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?**

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>.

- 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-33 Personnel Medical Records
- ✓ DOE-38 Occupational and Industrial Accident Records
- ✓ 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?**

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 MedGate 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 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. Technical control is achieved via roles within the application.

- 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. MedGate interfaces with Site Personnel Roster (SPR) and Training Records and Information Network (TRAIN). SPR shares personal employee information (e.g., name, social security number, company and organization codes, etc.) with TRAIN and MedGate. TRAIN references personal employee information (e.g., respirator fit information) in MedGate.

- 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 MedGate application must grant permission. Once provided, it is the responsibility of the other system owners to protect the data provided by MedGate.

- 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.