



PRIVACY IMPACT ASSESSMENT: SAVANNAH RIVER NUCLEAR SOLUTION
 ELECTRONIC DOCUMENT WORKFLOW (RECORDS) SYSTEM (EDWS)
 PIA Template Version 3 – May, 2009

E-1067

Department of Energy
 Privacy Impact Assessment (PIA)

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|--------------------------------|-------------------------------------|
| Affects Members Of the Public? | <input checked="" type="checkbox"/> |
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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

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| Date | February 24, 2010 | |
| Departmental Element & Site | Office of Environment Management Department of Energy – Savannah River Operations Office | |
| Name of Information System or IT Project | Savannah River Nuclear Solution (SRNS) Electronic Document Workflow (Records) System (EDWS) | |
| Exhibit Project UID | UPI Code: 019-10-01-15-01-1057-00 | |
| New PIA <input type="checkbox"/> | | |
| Update <input checked="" type="checkbox"/> | | |
| | Name, Title | Contact Information Phone, Email |
| System Owner | Larry Stein, Systems Administrator, EDWS, Savannah River Nuclear Solutions | (803) 952-7067 larry.stein@srs.gov |
| Local Privacy Act Officer | Pauline Conner, Privacy Act Officer | (803) 952-8134 pauline.conner@srs.gov |
| Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.) | Jannett M. Moran, Cyber Security Manager, Savannah River Nuclear Solutions | (803) 725-6925 jan.moran@srs.gov |



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MODULE I – PRIVACY NEEDS ASSESSMENT

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| Person Completing this Document | Pauline Conner, Privacy Act Officer | (803) 952-8134 pauline.conner@srs.gov |
| Purpose of Information System or IT Project | <p>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.</p> | |
| Type of Information Collected or Maintained by the System: | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> SSN Social Security number <input checked="" type="checkbox"/> Medical & Health Information e.g. blood test results <input checked="" type="checkbox"/> Financial Information e.g. credit card number <input checked="" type="checkbox"/> Clearance Information e.g. "Q" <input checked="" type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input checked="" type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> DoB, Place of Birth <input checked="" type="checkbox"/> Employment Information <input checked="" type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify | |
| Has there been any attempt to verify PII does not exist on the system? DOE Order 206.1, Department of Energy Privacy Program, defines PII as | No | |



MODULE I – PRIVACY NEEDS ASSESSMENT

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)

N/A

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

1. AUTHORITY

What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?

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. 2201(c), 2201(l)(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].

As provided in 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."



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MODULE II – PII SYSTEMS & PROJECTS

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| <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>Collection of the information in the EDWS is required to provide mass storage for electronic image and data files for all record types.</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>Yes. Contractors are involved in the configuration, 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.</p> <p>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.</p> |
| <p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p> | <p>The potential impact is MODERATE. The loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals. Adverse effects on individuals may include, but are not limited to, loss of the privacy to which individual are entitled under law.</p> <p>Security Plan, Version 0, dated May 30, 2007</p> <p>Date of Accreditation: June 8, 2007</p> |



MODULE II – PII SYSTEMS & PROJECTS

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| <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>Yes. The EDWS can retrieve data by using name, social security number, and site computer user ID.</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>Yes. 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;" and DOE-88 Epidemiologic and Other Health Studies, Surveys, and Surveillances</p> <p>Federal Register Vol. 74, No. 6/Friday, January 9, 2009 (pages 1000-10002, 1003-1005, 1008-1011, 1020-1022, 1032-1035, 1037-1045, 1052-1057, and 1088-1090)</p> |
| <p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p> | <p>N/A</p> |

DATA SOURCES



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| <p>8. What are the sources of information about individuals in the information system or project?</p> | <p>The EDWS collects data 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.</p> |
| <p>9. Will the information system derive new or meta data about an individual from the information collected?</p> | <p>No</p> |
| <p>10. Are the data elements described in detail and documented?</p> | <p>Yes. The vendor's database describes and documents the data elements.</p> |

DATA USE

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| <p>11. How will the PII be used?</p> | <p>The authorized employees will use the PII contained in EDWS to process data call inquiries. For example, the EDWS will process requests for records (i.e., medical, industrial hygiene, safety data, occupational radiation exposure data, payroll, pension, human resources data, etc.) received from present and former DOE, NNSA and contractor employees.</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>When applicable, SRNS will share the individuals' information with DOE, Department of Labor, National Institute for Occupational Safety and Health and other federal agencies.</p> |

Reports



MODULE II – PII SYSTEMS & PROJECTS

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| <p>14. What kinds of reports are produced about individuals or contain an individual's data?</p> | <p>The authorized user can generate a variety of reports that include the individual's medical, industrial, hygiene, safety information, human resources, payroll, benefits administration information, exposure information, etc. In addition, the authorized user can generate report for use by the appropriate local, state or Federal agencies, when that record alone or in conjunction with other information indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature, and whether arising by general statute or particular program.</p> |
| <p>15. What will be the use of these reports?</p> | <p>The use of the data is relevant and necessary for SRNS to manage, monitor, and record occupational radiation exposure data for present and former DOE, NNSA and contractor employees.</p> |
| <p>16. Who will have access to these reports?</p> | <p>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 and federal agencies may have access to the records maintained in the EDWS to ensure Departmental compliance with other regulatory requirements.</p> |
| <p>Monitoring</p> | |
| <p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p> | <p>No. The EDWS does not have the capability to identify, locate, and monitor individuals.</p> |
| <p>18. What kinds of information are collected as a function of the monitoring of individuals?</p> | <p>N/A</p> |
| <p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p> | <p>N/A</p> |
| <p>DATA MANAGEMENT & MAINTENANCE</p> | |
| <p>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.</p> | <p>EDWS does not verify the accuracy, relevance, and completeness of the data related to the public. EDWS collects basic data directly from the individual to whom it pertains. Therefore, it is determined that the information is accurate, timely and complete at the time it was provided.</p> |



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| <p>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</p> | <p>The system is licensed by and operated for U.S. Department of Energy Savannah River Operations Office.</p> |
| <p>Retention & Disposition</p> | |
| <p>22. What are the retention periods of data in the information system?</p> | <p>Retention periods are in accordance with National Archives and Records Administration (NARA) and DOE records schedules. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm.</p> |
| <p>23. What are the procedures for disposition of the data at the end of the retention period?</p> | <p>Procedures for disposition are documented in applicable NARA and DOE records schedule. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm.</p> |
| <p>ACCESS, SAFEGUARDS & SECURITY</p> | |
| <p>24. What controls are in place to protect the data from unauthorized access, modification or use?</p> | <p>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. The technical controls include restricted access via user-id and password based on user responsibility and job function.</p> |
| <p>25. Who will have access to PII data?</p> | <p>Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, and state and federal agencies may have access to certain records maintained in the EDWS to ensure Departmental compliance with other regulatory requirements.</p> |
| <p>26. How is access to PII data determined?</p> | <p>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.</p> |
| <p>27. Do other information systems share data or have access to the data in the system? If yes, explain.</p> | <p>Yes. The site records autoloading utility (AF2EDSW), 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.</p> |



MODULE II – PII SYSTEMS & PROJECTS

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?

There are no connecting information systems.

29. Who is responsible for ensuring the authorized use of personal information?

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.

END OF MODULE II

SIGNATURE PAGE

| | Signature | Date |
|--------------------------------|---|------------|
| PIA Approval Signatures | Original Copy Signed and On File with the DOE Privacy Office | 7 MAY 2010 |