



PRIVACY IMPACT ASSESSMENT: SAVANNAH RIVER NUCLEAR SOLUTION (SRNS)
 MEDGATE OCCUPATIONAL HEALTH AND SAFETY MEDICAL SYSTEM (OHS)
 (INCLUDES DRUG AND ALCOHOL TESTING (ASSISTANT))
 PIA Template Version 3 – May, 2009

E-1071

Department of Energy
 Privacy Impact Assessment (PIA)

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>

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This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	February 18, 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) MedGate Occupational Health and Safety Medical System (OHS) (Includes the Drug and Alcohol Testing System (Assistant))	
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	Charles R. Hayes, Manager, Health & Safety Analysis/Reporting, Savannah River Nuclear Solutions Gale K. Williams, Manager, Substance Abuse, Savannah River Nuclear Solutions	(803) 952-9918 chuck.hayes@srs.gov (803) 557-4699 gale.williams@srs.gov
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MODULE I – PRIVACY NEEDS ASSESSMENT

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
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 primary purpose of the MedGate Occupational Health and Safety System (OHS) 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 Department uses and maintains the information contained in MedGate to conduct epidemiological and other health studies, surveys and surveillances. Finally, MedGate encompasses historical legacy medical data from the Sentry Warehouse. The primary purpose of the Drug and Alcohol Testing System (Assistant) is for randomly selecting employees for drug and alcohol testing and storage of the results.</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 type="checkbox"/> Financial Information e.g. credit card number <input checked="" type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> DoB, Place of Birth <input checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify 	



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MODULE I – PRIVACY NEEDS ASSESSMENT

<p>Has there been any attempt to verify PII does not exist on the system?</p> <p><i>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.</i></p>	<p>No</p> <p>Based on existing system documentation and available data dictionaries, it is known that PII exists in the Information Systems covered by this Privacy Impact Assessment.</p>
<p>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</p>	<p>N/A</p>

Threshold Questions

<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	<p>Yes</p>
<p>2. Is the information in identifiable form?</p>	<p>Yes</p>
<p>3. Is the information about individual Members of the Public?</p>	<p>Yes</p>
<p>4. Is the information about DOE or contractor employees?</p>	<p>Yes</p> <p><input checked="" type="checkbox"/> Federal Employees</p> <p><input checked="" type="checkbox"/> Contractor Employees</p>

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.*) 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); 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); Department of Energy Organization Act (Executive Order 12009); and 42 U.S.C. 7151 and 7297; 42 U.S.C. 2201(c), 2201(l)(3), 5813 and 5817.

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."

2. CONSENT

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 manage medical, industrial hygiene and safety data of employees. In addition, the collection of the results from the Drug and Alcohol Testing system is required to ensure proper and accurate operation of the agency's employee drug testing program under Executive Order 12564. If the individuals do not provide the information, SRNS will not be able to manage medical, industrial hygiene and safety data, and manage the results from the drug-testing program for present and former DOE, NNSA and contractor employees.



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<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>
<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 MedGate OHS and Drug and Alcohol Testing System can retrieve data by using name, social security number, or the site's computer-generated alternate ID (Comp_Alt_ID).</p>



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<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-33, "Personnel Medical Records;" DOE-38, "Occupational and Industrial Accident Records;" and DOE-88, "Epidemiologic and Other Health Studies, Surveys and Surveillances"</p> <p>Federal Register Vol. 74, No. 6/Friday, January 9, 2009 (pages 1032-1035; 1039-1042; 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>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>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. The Drug and Alcohol Testing System (Assistant) collects demographic information from MedGate for the drug and alcohol-testing program. 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. The MedGate OHS may extract information as necessary from personnel files and lists, training files, medical records, legal case files, bioassay records, industrial hygiene files, and related sources.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No</p>



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<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>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The authorized employees will use the PII contained in MedGate OHS to manage medical, industrial hygiene and safety data for present and former DOE, NNSA and contractor employees. In addition, the authorized employees will extract the demographic information from the MedGate OHS for employees randomly selected for the drug and alcohol-testing program</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>No other agencies or entities will share the individual's information.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>The authorized user will generate a variety of reports that include medical, industrial hygiene, and safety information, and results from the drug and alcohol-testing 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 medical, industrial hygiene and safety data and the results from the drug and alcohol-testing program 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 MedGate OHS and Assistant to ensure Departmental compliance with other regulatory requirements.</p>



MODULE II – PII SYSTEMS & PROJECTS

Monitoring

17. Will this information system provide the capability to identify, locate, and monitor individuals?	No. The MedGate OHS and Assistant do not have the capability to identify, locate, and monitor individuals.
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.	MedGate OHS and Assistant do not verify the accuracy, relevance, and completeness of the data related to the public. MedGate OHS and Assistant collect 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.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	The system is licensed by and operated for the U.S. Department of Energy Savannah River Operations Office.

Retention & Disposition

22. What are the retention periods of data in the information system?	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 .
23. What are the procedures for disposition of the data at the end of the retention period?	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 .

ACCESS, SAFEGUARDS & SECURITY



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<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 MedGate OHS and Assistant 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 MedGate OHS 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 OHS. TRAIN references personal employee information (e.g., respirator fit information) in MedGate OHS. The Assistant retrieves PII from MedGate OHS for employees randomly selected for the drug and alcohol-testing program</p>
<p>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?</p>	<p>There are no connecting information systems.</p>
<p>29. Who is responsible for ensuring the authorized use of personal information?</p>	<p>The system owner for other systems to have access to data within the MedGate OHS and Assistant applications must grant permission. Once provided, it is the responsibility of the other system owners to protect the data provided by MedGate OHS.</p>

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