| Affects Members Of the Public? | X |
|---|---|

# Department of Energy
# Privacy Impact Assessment (PIA)

**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

| | |
|---|---|
| **Date** | June 12, 2009 |
| **Departmental Element & Site** | Idaho National Laboratory |
| **Name of Information System or IT Project** | Occupational Injury & Illness System (OI&IS) |
| **Exhibit Project UID** | 136 |
| **New PIA** ☒  **Update** ☐ | |

| | Name, Title | Contact Information Phone, Email |
|---|---|---|
| **System Owner** | Anthony J. Kavran<br>Occupational Injury & Illness Records Coordinator | (208) 526-5826<br>Anthony.Kavran@inl.gov |
| **Local Privacy Act Officer** | Dale Claflin<br>Privacy Act Officer | (208) 526-1199<br>Dale.Claflin@inl.gov |

# MODULE I – PRIVACY NEEDS ASSESSMENT

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| **Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)** | Daniel Jones<br><br>Technical Lead, Cyber Security | (208) 526-6477<br>Daniel.Jones@inl.gov |
| **Person Completing this Document** | Anthony J. Kavran<br><br>Occupational Injury & Illness Records Coordinator | (208) 526-5826<br>Anthony.Kavran@inl.gov |
| **Purpose of Information System or IT Project** | This is a database built at INL to specification in 1993/1994 that is currently a Microsoft Access database used to facilitate the capture of occupational injury and illness data to efficiently meet applicable DOE (DOE M 231.1-1A, Chg. 2) and OSHA (29 CFR 1904) regulatory drivers. This system is used to facilitate the efficient management of occupational injury and illness data to meet regulatory requirements, internal reporting commitments, and to support management of the Company's S&H Program. | |
| **Type of Information Collected or Maintained by the System:** | ☒ SSN<br><br>☒ Medical & Health Information<br><br>☐ Financial Information<br><br>☐ Clearance Information<br><br>☐ Biometric Information<br><br>☐ Mother's Maiden Name<br><br>☒ DoB, Place of Birth<br><br>☐ Employment Information<br><br>☐ Criminal History<br><br>☒ Name, Phone, Address<br><br>☐ Other – Please Specify | |

# MODULE I – PRIVACY NEEDS ASSESSMENT

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| **Has there been any attempt to verify PII does not exist on the system?**<br><br>**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.* | No – the database definitely contains information, as specified above, that would be considered Privacy Information. |
| **If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)** | |

## Threshold Questions

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| **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, but only in the sense that it contains occupational injury & Illness data pertaining to former INL employees, in addition to current employees. |
| **4. Is the information about DOE or contractor employees?** | ☐ Federal Employees<br>☒ 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.

# MODULE I – PRIVACY NEEDS ASSESSMENT

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.

# END OF PRIVACY NEEDS ASSESSMENT

# MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

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| **1. AUTHORITY**<br><br>**What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?** | This Microsoft Access database application is used to facilitate the capture of occupational injury and illness data to efficiently meet applicable DOE (DOE M 231.1-1A, Chg. 2) and OSHA (29 CFR 1904) regulatory drivers. |
| **2. CONSENT**<br><br>**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)?** | None; the data collected are essential to the efficient functioning of the Laboratory as required by Contract DE-AC07-05ID14517. |

# MODULE II – PII SYSTEMS & PROJECTS

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| **3. CONTRACTS**<br><br>**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?** | NO |
| **4. IMPACT ANALYSIS:**<br><br>**How does this project or information system impact privacy?** | This system contains various privacy data related to employees who have sustained occupational injuries and/or illnesses while working at the INL. |
| **5. SORNs**<br><br>**How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?**<br><br>**If yes, explain, and list the identifiers that will be used to retrieve information on the individual.** | Data can be queried using the individual's name, S Number, Social Security Number, OI&IS Case Number, or Medical Event Number. |
| **6. SORNs**<br><br>**Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?**<br><br>**If "Yes," provide name of SORN and location in the *Federal Register*.** | DOE-33, DOE-38 |

## MODULE II – PII SYSTEMS & PROJECTS

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| **7. SORNs**<br><br>**If the information system is being modified, will the SORN(s) require amendment or revision?** | NO |

### DATA SOURCES

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| **8. What are the sources of information about individuals in the information system or project?** | Information in the system comes from many sources including an electronic import from the Occupational Medicine Program's OMSS system, Work Comp Claim forms completed by the affected employee, and Investigation forms completed by the Manager and S&H Professional |
| **9. Will the information system derive new or meta data about an individual from the information collected?** | NO |
| **10. Are the data elements described in detail and documented?** | Yes, the data dictionary is available via Enterprise Architecture |

### DATA USE

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| **11. How will the PII be used?** | The PII is used to meet applicable DOE (DOE M 231.1-1A, Chg. 2) and OSHA (29 CFR 1904) regulatory drivers associated with employees who sustain occupational injuries & illnesses. |
| **12. If the system derives meta data, how will the new or meta data be used?**<br><br>**Will the new or meta data be part of an individual's record?** | N/A |
| **13. With what other agencies or entities will an individual's information be shared?** | DOE and the U.S. Department of Labor, Bureau of Labor Statistics |

# MODULE II – PII SYSTEMS & PROJECTS

| Reports | |
|---|---|
| **14. What kinds of reports are produced about individuals or contain an individual's data?** | Some Occupational Injury & Illness Reports |
| **15. What will be the use of these reports?** | Reports are used to meet applicable DOE (DOE M 231.1-1A, Chg. 2) and OSHA (29 CFR 1904) regulatory requirements. |
| **16. Who will have access to these reports?** | The BEA Occupational Injury & illness Records Coordinator is the only one who has actual access to the OI&IS database. However, data from the database is entered into DOE's CAIRS database, as appropriate, per DOE M 231.1-1A, Chg.2. Authorized employees with a need to know in DOE-ID and DOE-HQ would then have access via the CAIRS System. |

| Monitoring | |
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| **17. Will this information system provide the capability to identify, locate, and monitor individuals?** | NO |
| **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?** | The BEA Occupational Injury & illness Records Coordinator is the only one who has actual access to the OI&IS database. However, data from the database is entered into DOE's CAIRS database, as appropriate, per DOE M 231.1-1A, Chg.2. Authorized employees with a need to know in DOE-ID and DOE-HQ would then have access via the CAIRS System. |

| DATA MANAGEMENT & MAINTENANCE | |
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| **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.** | The system is intended to contain data related to the individual at the time of the occupational injury or illness. Existing requirements for occupational injury & illness purposes do not require that demographic data be maintained current (i.e. address). |

# MODULE II – PII SYSTEMS & PROJECTS

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| **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 BEA Occupational Injury & illness Records Coordinator is the only one who has actual access to the OI&IS database. However, data from the database is entered into DOE's CAIRS database, as appropriate, per DOE M 231.1-1A, Chg.2. |
| **Retention & Disposition** | |
| **22. What are the retention periods of data in the information system?** | NA |
| **23. What are the procedures for disposition of the data at the end of the retention period?** | N/A |
| **ACCESS, SAFEGUARDS & SECURITY** | |
| **24. What controls are in place to protect the data from unauthorized access, modification or use?** | The INL has implement controls per the DOE's Program Cyber Security Plan version 1.2 and continues to operate within the guidance of the PCSP. This system is included in the Business Enclave, which is categorized as moderate, and was certified and accredited December 19, 2007. |
| **25. Who will have access to PII data?** | The BEA occupational injury & Illness Coordinator will have access to all information. Authorized individuals at DOE-ID and DOE-HQ will only have access to the information necessary to complete the DOE Form 5484.3 for data input to CAIRS, as required by applicable DOE (DOE M 231.1-1A, Chg. 2) and OSHA (29 CFR 1904) regulatory drivers. |
| **26. How is access to PII data determined?** | Strictly on a need-to-know basis. The BEA occupational injury & Illness Coordinator will have access to all information. Authorized individuals at DOE-ID and DOE-HQ will only have access to the information necessary to complete the DOE Form 5484.3 for data input to CAIRS, as required by applicable DOE (DOE M 231.1-1A, Chg. 2) and OSHA (29 CFR 1904) regulatory drivers. |
| **27. Do other information systems share data or have access to the data in the system? If yes, explain.** | Some data is imported from Medical's OMSS database for individuals incurring an occupational injury or illness. Some data from the OI&IS system is re-entered into the DOE CAIRS database. |

## MODULE II – PII SYSTEMS & PROJECTS

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| 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? | NO |
| 29. Who is responsible for ensuring the authorized use of personal information? | Occupational Injury & Illness Records Coordinator |

## END OF MODULE II

## SIGNATURE PAGE

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