

PRIVACY IMPACT ASSESSMENT: WSI-Savannah River Site (SRS) TEAM
HUMAN RESOURCES/PAYROLL
PIA Template Version 3 – May, 2009

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	October 14, 2009	
Departmental Element & Site	Office of Environmental Management Department of Energy – Savannah River Operations Office	
Name of Information System or IT Project	WSI-Savannah River Site (SRS) Human Resources/Payroll (HR/PR)	
Exhibit Project UID	UPI Code: 019-10-01-15-01-1057-04	
New PIA Update		
	Name, Title	Contact Information Phone, Email
System Owner	Allen Roberson, Mgr., Accounting Charles Shaver, Mgr., Compensation & Benefits	(803) 952-7621 allen.roberson@srs.gov (803) 952-7997 charles.shaver@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,	Pamela Livingston-Spruill, Security Manager, WSI-SRS	(803) 952-7634 P.Livingston-Spruill@srs.gov

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CSSM, ISSO, etc.)		
Person Completing this Document	Pauline Conner, Privacy Act Officer	(803) 952-8134 pauline.conner@srs.gov
Purpose of Information System or IT Project	The primary purpose of the WSI-SRS Human Resources is managing the benefits and human resources data for current and former employees and maintaining the employee demographics (Personally Identifiable Information), skills, assignments, and salary and benefit information. The primary purpose of the WSI-SRS Payroll is to process weekly payroll and payroll deductions.	
Type of Information Collected or Maintained by the System:	<input checked="" type="checkbox"/> SSN Social Security number <input 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 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 – Passport Number	
Has there been any attempt to verify PII does not exist on the system?	No System contains PII.	
<p>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</p>		

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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?

NO

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.

END OF PRIVACY NEEDS ASSESSMENT

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MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

<p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<p>42 U.S.C. [United States Code] 7101 <i>et seq.</i>; 50 U.S.C. 2401 <i>et seq.</i>; 50 U.S.C. 2401 <i>et seq.</i> and the Memorandum of Understanding between the Department of Energy and the Department of Health and Human Services, 56 FR 9701, March 7, 1991.</p> <p>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."</p>
<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 HR/PR is required to provide employee compensation and benefits to current and former employees, dependents and survivors and to properly withhold applicable taxes, and process other lawfully mandated payroll deductions. If the individuals do not provide the information, WSI-SRS will not be able to provide employee compensation and benefits to current and former employees, dependants, and survivors and to properly withhold applicable taxes and process other lawfully mandated payroll deductions.</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 are 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>N/A</p>

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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 WSI-SRS HR/PR can retrieve data by using name and a unique employee site identification code.</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 5, "Personnel Records of Former Contractor Employees"</p> <p>Federal Register Vol. 74, No. 6/Friday, January 9, 2009 (pages 1003-1005)</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 HR/PR system collects information from the individual to whom it pertains. In addition, HR/PR system collects information from current and former employees, dependents, survivors, and 401-k provider.</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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10. Are the data elements described in detail and documented?	Yes. The data elements are contained in the system design documentation.
DATA USE	
11. How will the PII be used?	The authorized employees will use the PII contained in WSI-SRS HR/PR to manage the benefits and human resources data for current and former employees, to maintain the employees demographics, skills, assignments, salary and benefit information, and to process weekly payroll and payroll deduction.
12. If the system derives meta data, how will the new or meta data be used? 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?	No other agencies or entities will share the individual's information.
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Personnel oriented reports and other aggregated reports for analysis and planning (i.e. payroll, earning and deduction registers, tax reports).
15. What will be the use of these reports?	The use of the data is relevant and necessary to verify an individual's identity and for WSI-SRS to perform its required human resources and payroll responsibilities associated with their employees, former employees, dependents, and survivors. Furthermore, the appropriate local, state and federal agencies will use certain records maintained in the WSI-SRS HR/PR to ensure Departmental compliance with other regulatory requirements.
16. Who will have access to these reports?	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 WSI-SRS HR/PR to ensure Departmental compliance with other regulatory requirements.

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Monitoring

17. Will this information system provide the capability to identify, locate, and monitor individuals?	No. The WSI-SRS HR/PR does 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.	WSI-SRS HR/PR 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.
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 and operated at WSI Savannah River Site.

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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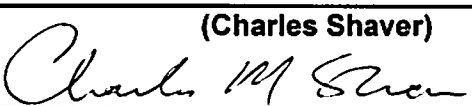
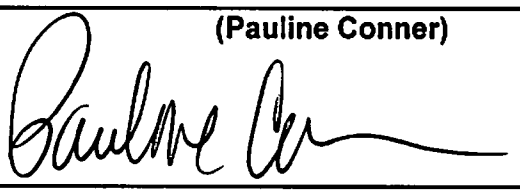

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<p>24. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include 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 an audit feature that tracks employee actions within the system.</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 will use certain records maintained in the WSI-SRS HR/PR 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.</p>
<p>26. How is access to PII data determined?</p>	<p>System owners determine 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. Information is retrieved from the Training Automated Records Management System to update clearance and assignment information.</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>The primary information system access agreement at SRS is the Code of Conduct. A Nondisclosure Agreement (NDA) is initially required for all employees and addresses information disclosure. The NDA is maintained in the employee file. An Ethics & Conflict of Interest agreement is required initially for all employees and is updated by appropriate HR division annually and/or when deemed necessary.</p>
<p>29. Who is responsible for ensuring the authorized use of personal information?</p>	<p>System Owners; Information and Personnel Security Department Manager; Information and Resources Management Department, Manager.</p>

END OF MODULE II



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SIGNATURE PAGE		
	Signature	Date
System Owner	<p align="center">(Allen Roberson)</p>  <p align="center">(Signature)</p>	10/28/09
	<p align="center">(Charles Shaver)</p>  <p align="center">(Signature)</p>	10/26/09
Local Privacy Act Officer	<p align="center">(Pauline Conner)</p>  <p align="center">(Signature)</p>	11/01/2009
Jerry Hanley Chief Privacy Officer	 	11/10/09
Ingrid Kolb Senior Agency Official for Privacy (SAOP)		