



PRIVACY IMPACT ASSESSMENT: Human Resources – Personal Information

Change Request

PIA Template Version 3 – May, 2009

Affects Members Of the Public?	<input checked="" type="checkbox"/>
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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		
Departmental Element & Site	Idaho National Engineering Laboratory Engineering Research Office Building (EROB)	
Name of Information System or IT Project	Human Resources – Personal Information Change Request Business Enclave	
Exhibit Project UID	106800	
New PIA <input checked="" type="checkbox"/>		
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Michelle Bingham Technical Lead, Human Resources	208-526-7830 Michelle.Bingham@inl.gov
Local Privacy Act Officer	Dale Claflin Privacy Act Officer	208-526-1199 Dale.Claflin@inl.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Daniel Jones Technical Lead, Cyber Security	208-526-6477 Daniel.Jones@inl.gov



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MODULE I – PRIVACY NEEDS ASSESSMENT

Person Completing this Document	Scott Welch	208-526-0478 Scott.Welch@inl.gov
Purpose of Information System or IT Project	Provides a means for employees to update their personal information (marital status, address/phone number, emergency contact, etc.) in company records.	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input 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 type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify – Also collects employee emergency contact information (name and phone number of emergency contact)	
Has there been any attempt to verify PII does not exist on the system? <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>	YES	
If "Yes," what method was used to verify the system did not	Manual validation was provided by	



MODULE I – PRIVACY NEEDS ASSESSMENT

contain PII? (e.g. system scan)

the Data Services group. Additionally, when performing the Privacy Impact Assessment information was verified.

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.

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS



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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>DOE Contract No: DE-AC07-05ID14517</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>Form is filled out by individual employee when there is a name (e.g. marital status) change, address or phone number change and/or if there is a change to the employee's emergency contact information. This type of information is required for various business reasons (e.g. W-2, emergency contact).</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>NO</p>
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>The data maintained on this system has the same potential to impact an individual's privacy as would the loss of similar data from any public, private, government, or other system if not properly safeguarded.</p>



MODULE II – PII SYSTEMS & PROJECTS

<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, Data can be retrieved by name and S number.</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>DOE-05</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>NO</p>
DATA SOURCES	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>The individual employee provides the information.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>10. Are the data elements described in detail and documented?</p>	<p>No – this is a stand alone form. The data from this form is entered in to the employee’s profile with the HR System (i.e. PeopleSoft).</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The information on this form is entered in to the HR System (PeopleSoft). It is used to make sure we have the employee’s correct legal name, home/ mailing address, home phone numbers, and emergency contact information. The name, address, and phone number is used to contact the employee (e.g. mail company W-2) and the emergency contact information is collected in case we need to make notification of a work related injury.</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 agency will see the information that is stored on this form.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual’s data?</p>	<p>No reports are generated from this specific form. As mentioned above, the information is entered into the HR System (PeopleSoft); see PeopleSoft PIA for more details.</p>
<p>15. What will be the use of these reports?</p>	<p>N/A</p>
<p>16. Who will have access to these reports?</p>	<p>N/A</p>
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>The information gathered from this form is used to locate individual’s addresses and phone numbers, as well as emergency contact phone numbers. Monitoring of individuals is not possible.</p>



MODULE II – PII SYSTEMS & PROJECTS

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.	It is the employee’s responsibility to fill out this specific form if they have any change in their name, address, phone number or emergency contact. Completed forms are maintained in the employee’s personal files.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A

Retention & Disposition

22. What are the retention periods of data in the information system?	The final hard copy form is printed out and placed in the employee file (which is scanned into our company records storage system). These are retained according to the INL records schedule matrix – which is based on federal requirements and company procedures (75 years after the employee die).
23. What are the procedures for disposition of the data at the end of the retention period?	After the retention period has expired, the records are destroyed.

ACCESS, SAFEGUARDS & SECURITY

24. What controls are in place to protect the data from unauthorized access, modification or use?	The INL has implemented 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 Self Managed Environment Enclave, which is categorized as low, and was certified and accredited January 28, 2008.
25. Who will have access to PII data?	The employee who submitted the data. Employees within the Human Resources and Diversity department and the IT programmer.



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Change Request

PIA Template Version 3 – May, 2009

MODULE II – PII SYSTEMS & PROJECTS

26. How is access to PII data determined?	Strictly on a need-to-know basis in the performance of assigned duties.
27. Do other information systems share data or have access to the data in the system? If yes, explain.	No
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?	HR&D management.

END OF MODULE II

SIGNATURE PAGE

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