



PRIVACY IMPACT ASSESSMENT: Occupational Medicine – Assistant

PIA Template Version 3 – May, 2009

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>

Please complete electronically: no hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Date</b>	June 10, 2009	
<b>Departmental Element &amp; Site</b>	Idaho National Laboratory	
<b>Name of Information System or IT Project</b>	Occupational Medicine - Assistant	
<b>Exhibit Project UID</b>	Indirect funded Occupational Safety and Health	
<b>New PIA</b> <input checked="" type="checkbox"/>		
<b>Update</b> <input type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	Lisa Edelmayer, Technical Lead, Occupational Medicine Assistant Employees	208-526-2692 Lisa.Edelmayer@inl.gov
<b>Local Privacy Act Officer</b>	Dale Claflin Privacy Act Officer	208-526-1199 Dale.Claflin@inl.gov



**MODULE I – PRIVACY NEEDS ASSESSMENT**

<b>Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)</b>	Daniel Jones Technical Lead, Cyber Security	208-526-6477 Daniel.Jones@inl.gov
<b>Person Completing this Document</b>	John Brabec Occupational Medicine Office Manager	(208) 526-0024 John.Brabec@INL.gov
<b>Purpose of Information System or IT Project</b>	To generate and randomize INL drug screen candidates for Federal mandated drug screen programs and maintain results history. Interface tool between Quest Diagnostics Laboratory (analytical lab) and BEA for drug screen results.	
<b>Type of Information Collected or Maintained by the System:</b>	<input checked="" type="checkbox"/> SSN <input checked="" type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <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 only name is in data base <input type="checkbox"/> Other – Please Specify	
<b>Has there been any attempt to verify PII does not exist on the system?</b>  DOE Order 206.1, Department of Energy Privacy Program, defines PII as	YES	



## 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)**

Manual validation was provided by 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, it contains former employee information and potential new hire drug screens.

**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



## MODULE I – PRIVACY NEEDS ASSESSMENT

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

#### 1. AUTHORITY

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

In support of a drug free workplace and to comply with 49 CFR 40, 10 CFR 707, and 10 CFR 712.

#### 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)?**

Individual must provide a social security number or company S number and name. If not provided for tracking purposed this would be determined to be a failure to test for drug screening purposes.



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>3. CONTRACTS</b></p> <p><b>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?</b></p>	<p>Yes, procurement includes a privacy statement in our contracts.</p>
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>Information is very limited and only used to validate illegal drug use and provide tool to randomize drug screen candidate testing; used internally to the company.</p>
<p><b>5. SORNs</b></p> <p><b>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</b></p> <p><b>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</b></p>	<p>Data can be retrieved by name, SSN.</p>
<p><b>6. SORNs</b></p> <p><b>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</b></p> <p><b>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</b></p>	<p>DOE-33</p>



## MODULE II – PII SYSTEMS & PROJECTS

<b>7. SORNs</b>  If the information system is being modified, will the SORN(s) require amendment or revision?	NO
<b>DATA SOURCES</b>	
<b>8. What are the sources of information about individuals in the information system or project?</b>	Individual-provided; lab drug screen results
<b>9. Will the information system derive new or meta data about an individual from the information collected?</b>	NO
<b>10. Are the data elements described in detail and documented?</b>	Yes, supplier has a disk available.
<b>DATA USE</b>	
<b>11. How will the PII be used?</b>	Used to determine current individuals in pool and past drug test results.
<b>12. If the system derives meta data, how will the new or meta data be used?</b>  Will the new or meta data be part of an individual's record?	N/A
<b>13. With what other agencies or entities will an individual's information be shared?</b>	BEA security receives reports of who is in pool to validate need to be in or out of pool.

Reports



**MODULE II – PII SYSTEMS & PROJECTS**

<p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>Drug screen history report and list of individuals in drug screen pool.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>To determine who should be in pools and out of pools and allow for random selection of drug screen candidates.</p>
<p><b>16. Who will have access to these reports?</b></p>	<p>Drug screen administrator and Security TDP administrator.</p>
<p><b>Monitoring</b></p>	
<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>NO</p>
<p><b>18. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>DATA MANAGEMENT &amp; MAINTENANCE</b></p>	
<p><b>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.</b></p>	<p>Some data is historical on past employees and does not require updating. Current drug screen pool candidates are evaluated monthly by Security to determine who should be in and out of pools.</p>
<p><b>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</b></p>	<p>Operated only at INL.</p>
<p><b>Retention &amp; Disposition</b></p>	



## MODULE II – PII SYSTEMS & PROJECTS

<b>22. What are the retention periods of data in the information system?</b>	Occupational Medicine will retain negative drug test results, for a minimum of 3 years from completion of testing. Occupational Medicine will retain all records relating to positive drug test results for a minimum of 5 years after employee terminates employment.
<b>23. What are the procedures for disposition of the data at the end of the retention period?</b>	Disposition of all information follows company and federal record retention and disposition policies and procedures.
<b>ACCESS, SAFEGUARDS &amp; SECURITY</b>	
<b>24. What controls are in place to protect the data from unauthorized access, modification or use?</b>	Access to system is password protected; only the drug screen administrator and Security TDP administrator have access.
<b>25. Who will have access to PII data?</b>	Only the drug screen administrator and Security TDP administrator have access.
<b>26. How is access to PII data determined?</b>	By need to know, and request to drug screen administrator.
<b>27. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	NO
<b>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?</b>	Quest Diagnostics Laboratory contract has PII procurement clause in contracting language.
<b>29. Who is responsible for ensuring the authorized use of personal information?</b>	System owner and drug screen administrator.

END OF MODULE II



## SIGNATURE PAGE

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