# Department of Energy Privacy Impact Assessment (PIA)

Name of Project:

Occupational Health Manager

Bureau:

U. S. Department of Energy (DOE)

Carlsbad Field Office (CBFO)

Project Unique ID:

019-10-02-00-02-5000-04-404-139

Date:

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### A. CONTACT INFORMATION

1. Who is the person completing this document?

Ms. Sharon Warren-Briggs Carlsbad Technical Assistance Contractor 4021 National Parks Highway, Carlsbad, NM 88220 (505) 234-7406 sharon.warren.briggs@wipp.ws

2. Who is the system owner?

Mr. Richard Farrell, Safety Officer U. S. Department of Energy, Carlsbad Field Office PO Box 3090, Carlsbad, NM 88221-3090 (505) 234-7327 richard.farrell@wipp.ws

3. Who is the system manager for this system or application?

Ms. Anita J. Self, RN, COHNS Waste Isolation Pilot Plant Health Services Administrator P.O. Box 2078, Carlsbad, NM 88221-2078 (505) 234-8493 anita.self@wipp.ws

4. Who is the IT Security Manager who reviewed this document?

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5. Who is the Privacy Act Officer who reviewed this document?

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# B. <u>SYSTEM APPLICATION/GENERAL INFORMATION</u>

- Does this system contain any information about individuals?
   Yes.
  - a. Is this information identifiable to the individual?
     Yes.
  - Is the information about individual members of the public?
     Yes.
  - Is the information about DOE or contractor employees?
     Yes. Medical information is maintained on current and former DOE employees.
- 2. What is the purpose of the system/application?

The primary purpose is to document medical interventions associated with surveillance programs, immunization programs, and individual health encounters for the Department of Energy Carlsbad Field Office and its contractors.

3. What legal authority authorizes the purchase or development of this system/application?

Atomic Energy Act of 1954 (42 United States Code (U.S.C.) 2051a); Economy Act of 1932, as amended (31 U.S.C. 1535); 42 U.S.C. 7101 et seq.; 50 U.S.C. 2401 et seq.; and Department of Energy Order 440.1.

#### C. DATA IN THE SYSTEM

What categories of individuals are covered in the system?

Current and former Department of Energy employees and contractor employees who have used medical services at the Waste Isolation Pilot Plant (WIPP).

- 2. What are the sources of information in the system?
  - a. Is the source of the information from the individual or is it taken from another source?

The information is obtained from the individual to whom it pertains.

- What Federal agencies are providing data for use in the system?
   None.
- c. What tribal, state, and local agencies are providing data for use in the system?None.
- from what other third party sources will data be collected?
   None.
- e. What information will be collected from the individual and the public?

  The system collects name, social security number, date of birth, mailing address, employer, emergency contact information, and health history.
- 3. Accuracy, Timeliness, and Reliability
  - a. How will data collected from sources other than DOE records be verified for accuracy?

Since the data is obtained from the individual to whom it pertains, it is assumed to be accurate when it is provided.

b. How will data be checked for completeness?

Since the information is received from the individual to whom it pertains, it is assumed to be complete when it is provided.

c. Are the data current? What steps or procedures are taken to ensure the data are current and not out-of-date?

Yes. WTS contractor staff receive a request for update of emergency points of contact (POC) every two years. When federal or contractor staff receive influenza shots, POC information is requested prior to administration of the vaccine. Periodic data transfer from Human Resources is used to provide updates to demographic information for contractor staff.

d. Are the data elements described in detail and documented?
 Yes. The data elements are described in detail in the data schema.

#### D. ATTRIBUTES OF THE DATA

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes. Data in the system documents medical interventions associated with surveillance programs, immunization programs, and individual health encounters for individuals working at the WIPP site or in town at the support buildings.

Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

Nο

Will the new data be placed in the individual's record?
 N/A.

4. Can the system make determinations about employees/the public that would not be possible without the new data?

N/A.

How will the new data be verified for relevance and accuracy?
 N/A.

6. If the data are being consolidated, what controls are in place to protect the data from unauthorized access or use?

N/A.

 If processes are being consolidated, do the proper controls remain in place to protect the data and prevent unauthorized access?
 N/A.

- 8. How will data be retrieved? Does a personal identifier retrieve the data? If yes, explain, and list the identifiers that will be used to retrieve information on the individual.
  - Yes. Data are retrieved by name and social security number.
- 9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

TYPE OF REPORT	PURPOSE OF REPORT	ACCESS TO REPORT
Hearing analysis reports	Determine if an individual in the surveillance program is maintaining or losing hearing	Health Services staff
Respiratory function reports	Determine if an employee in the respirator fit program is maintaining or losing lung function and ability to wear a respirator	Health Services staff
Immunization status report	Determine if employees are current under CDC guidelines for immunizations	Health Services staff
Medical Surveillance tracking reports	Ensure employees are medically qualified and to schedule annual examinations as required by 29 Code of Federal Regulations 1910	Health Services staff

10. 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)?

The personal information stored in the system about employees that use medical services is required in order for the Department of Energy to protect the individuals' health and welfare in accordance with medical surveillance requirements. However, a category coded as "visitor" has been created to document encounters with personnel that do not choose to provide identifying information if they are not in a mandated surveillance program or in the Washington TRU Solutions LLC Human Resources data base.

## E. MAINTENANCE AND ADMINISTRATIVE CONTROLS

 If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?
 N/A.

2. What are the retention periods of data in the system?

These records are subject to different schedules, all under DOE Administrative Schedule 1 (Personnel), according to the type of treatment given and the individual to whom it was provided. The schedules are detailed in the Records Inventory and Disposition Schedule (RIDS) for the Safety and Health Services Group, Safety and Health (S&H), and Industrial Safety and Hygiene (IS&H). All schedules require the records to be maintained for 75 years. When an employee leaves, all OHM records pertaining to that individual are archived within the system and a printed copy is kept in secure storage on site.

3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept?

When the records have reached the end of their lifecycle, they will be reviewed for disposition. Depending on the circumstances that exist, they could be shredded as scheduled or kept indefinitely in response to legal requirements. The reports are currently scheduled to be kept for 75 years after the subject employee has departed.

- Is the system using technologies in ways that DOE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?
   No.
- How does the use of this technology affect public/employee privacy?
   N/A.
- Will this system provide the capability to identify, locate, and monitor individuals?
   No.
- 7. What kinds of information are collected as a function of the monitoring of individuals?

N/A.

What controls will be used to prevent unauthorized monitoring?
 N/A.

- 9. Under which PA system of records notice does the system operate? The system operates in accordance with Department of Energy-33 (Personnel Medical Records-DOE and Contractor Employees) and DOE-38 (Occupational and Industrial Accident Records) and Office of Personnel Management (OPM)/GOVT-10, Employee Medical File System Records
- If the system is being modified, will the PA system of records notice require amendment or revision?
   N/A.

#### F. ACCESS TO DATA

- 1. Who will have access to the data in the system?
  - Department of Energy contractor medical staff. Access to personal data in the system will be strictly controlled based on job responsibility and function.
- 2. How is access to the data by a user determined?
  - Access to data is determined by evaluation of job responsibilities within Health Services. Based on the evaluation, the user is assigned permissions that are applied using system access control.
- 3. Will users have access to all data on the system or will the user's access be restricted?
  - Access will be restricted by job roles and responsibilities.
- 4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?
  - Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include restricted access via user ID and password based on user responsibility and job function.
- Are contractors involved with the design and development of the system and will
  they be involved with the maintenance of the system? If yes, were PA contract
  clauses included in their contracts and other regulatory measures addressed?
   No.
- 6. Do other systems share data or have access to the data in the system? If yes, explain.

No.

7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

- Ms. Anita Self, RN COHN, Health Services Administrator
- 8. Will other agencies share data or have access to the data in this system?
  No.
- How will the data be used by the other agency?
   N/A.
- 10. Who is responsible for assuring proper use of the data?Mr. Richard Farrell, Safety OfficerU.S. Department of Energy Carlsbad Field Office

# The Following Officials Have Approved this Document

1. System Manager			
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