



PRIVACY IMPACT ASSESSMENT: Visitor Dosimeter Badge Tracking  
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**

<b>Date</b>	June 11, 2009
<b>Departmental Element &amp; Site</b>	Idaho National Laboratory Building 616 Willow Creek Building
<b>Name of Information System or IT Project</b>	Visitor Dosimeter Badge Tracking
<b>Exhibit Project UID</b>	217975
<b>New PIA</b> <input checked="" type="checkbox"/>	
<b>Update</b> <input type="checkbox"/>	

	Name, Title	Contact Information Phone, Email
<b>System Owner</b>	Lynn Rockhold  Project Manager, INL Energy Employees' Occupational Illness Compensation Program	(208) 526-1768 Lynn.Rockhold@inl.gov



**PRIVACY IMPACT ASSESSMENT: Visitor Dosimeter Badge Tracking**  
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**MODULE I – PRIVACY NEEDS ASSESSMENT**

<b>Local Privacy Act Officer</b>	Dale Claflin Privacy Act Officer	(208) 526-1199 Dale.Claflin@inl.gov
<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>	Lynn Rockhold Project Manager, INL Energy Employees' Occupational Illness Compensation Program	(208) 526-1768 Lynn.Rockhold@inl.gov
<b>Purpose of Information System or IT Project</b>	The Visitor Dosimeter Badge Database is strictly an internal system with access controls. It is used for collecting dates, facilities and exposures for claimants of the Energy Employees' Occupational Illness Compensation Program Act (EEOICPA)	
<b>Type of Information Collected or Maintained by the System:</b>	<input checked="" type="checkbox"/> SSN <input 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	



## MODULE I – PRIVACY NEEDS ASSESSMENT

	<input checked="" type="checkbox"/> Name  <input checked="" type="checkbox"/> Other – Security or Dose Badge Number and/or Radiation Exposure
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<p><b>Has there been any attempt to verify PII does not exist on the system?</b></p> <p><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></p>	<p>Yes</p>
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<p><b>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</b></p>	<p>Manual validation was provided by the Data Services group. Additionally, when performing the Privacy Impact Assessment information was verified.</p>
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### Threshold Questions

<p><b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b></p>	<p>YES</p>
<p><b>2. Is the information in identifiable form?</b></p>	<p>YES</p>
<p><b>3. Is the information about Individual Members of the Public?</b></p>	<p>YES</p>
<p><b>4. Is the information about DOE or contractor employees?</b></p>	<p>YES</p> <p><input checked="" type="checkbox"/> Federal Employees</p> <p><input checked="" type="checkbox"/> Contractor Employees</p>

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



## MODULE I – PRIVACY NEEDS ASSESSMENT

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

### AUTHORITY, IMPACT & NOTICE

<p><b>1. AUTHORITY</b></p> <p><b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b></p>	<p>The Energy Employees' Occupational Illness Compensation Program Act (EEOICPA), a Congressional Act</p> <p>Executive Order 13179 — Providing Compensation to America's Nuclear Weapons Workers</p> <p>Public Law 106-398, the Energy Employees Occupational Illness Compensation Program Act of 2000</p>
<p><b>2. CONSENT</b></p> <p><b>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)?</b></p>	<p>N/A</p> <p>The PII is required by Department of Labor (DOL), the Administrator of the EEOICPA. The INL receives the claimant's name and Social Security information from the agency, not the individual.</p>



## 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>NO</p>
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>If the system was tampered with and the information was accessed by an unauthorized user or was not destroyed properly, upon meeting the disposition authority, it could compromise the claimant's PII information.</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>YES</p> <p>The information can be retrieved from the Visitor Dose Tracking Database by Name, Social Security Number and/or Badge Number.</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>YES. DOE-05, DOE-35, DOE-51</p>



**MODULE II – PII SYSTEMS & PROJECTS**

<p><b>7. SORNs</b></p> <p><b>If the information system is being modified, will the SORN(s) require amendment or revision?</b></p>	<p>NO</p>
<p><b>DATA SOURCES</b></p>	
<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>The information is generated from dosimetry badges worn by employees at the Idaho National Laboratory.</p> <p>The linking claimant information is provided to the Idaho National Laboratory by Regional EEOICPA Resource Centers, a DOL District Claims Office, by the National Institute of Occupational Safety &amp; Health (NIOSH), by the Department of Energy (DOE)-Chicago Office or by the DOE-Grand Junction Office.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>NO</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>N/A</p>
<p><b>DATA USE</b></p>	
<p><b>11. How will the PII be used?</b></p>	<p>It links the correct claimant to the various dose history records searched (i.e., verify name, Social Security or Badge Number).</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>12. If the system derives meta data, how will the new or meta data be used?</b></p> <p><b>Will the new or meta data be part of an individual's record?</b></p>	<p>N/A</p>
<p><b>13. With what other agencies or entities will an individual's information be shared?</b></p>	<p>It will be shared with DOL, NIOSH, DOE-HQ, DOE-Chicago, DOE-Idaho and/or Subcontractor HR Departments</p>
<p><b>Reports</b></p>	
<p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>Only claimant dose history information.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>To assist the adjudicating agency in determining if the claimant qualifies for compensation.</p>
<p><b>16. Who will have access to these reports?</b></p>	<p>The INL EEOICPA Staff and any / all agencies involved in EEOICPA.</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>

### DATA MANAGEMENT & MAINTENANCE



## MODULE II – PII SYSTEMS & PROJECTS

<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>N/A - There is no need to keep the information current, as the EEOICPA claim is a one-time effort, not an on-going effort.</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>N/A – No other site utilizes the INL Visitor Dose Tracking Database.</p>
<p><b>Retention &amp; Disposition</b></p>	
<p><b>22. What are the retention periods of data in the information system?</b></p>	<p>Uncertain at this time.</p>
<p><b>23. What are the procedures for disposition of the data at the end of the retention period?</b></p>	<p>The Visitor Dose Tracking retirement will be based on requirements.</p>
<p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>	
<p><b>24. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>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 Business Enclave, which is categorized as moderate, and was certified and accredited December 19, 2007.</p>
<p><b>25. Who will have access to PII data?</b></p>	<p>The INL EEOICPA Project Manager and staff.</p>





## MODULE II – PII SYSTEMS & PROJECTS

<b>26. How is access to PII data determined?</b>	Determined by those processing EEOICPA claims for the INL.
<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>	N/A
<b>29. Who is responsible for ensuring the authorized use of personal information?</b>	The INL EEOICPA Project Manager is responsible.

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>	