



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	
<b>Name of Information System or IT Project</b>	Training Records and Information Network (TRAIN)	
<b>Exhibit Project UID</b>	70	
<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>	Carla J. Drake, Manager Systems Approach to Learning & Performance	(208) 526-0841 Carla.Drake@inl.gov
<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,</b>	Daniel Jones, Technical Lead Cyber Security	(208) 526-6477 Daniel.Jones@inl.gov



## MODULE I – PRIVACY NEEDS ASSESSMENT

CSSM, ISSO, etc.)		
<b>Person Completing this Document</b>	Carla J. Drake, Manager Systems Approach to Learning & Performance	(208) 526-0841 Carla.Drake@inl.gov
<b>Purpose of Information System or IT Project</b>	TRAIN provides an electronic record of employee training activities and projected training needs at the INL. It is accessible site-wide to all employees via the intranet. TRAIN is integrated with other applications at the INL, such as Radiological Work Permits, respirator issue, and facility access controls, and provides support to the AMWTP contractor.	
<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 checked="" type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify	
<b>Has there been any attempt to verify PII does not exist on the system?</b>	YES	
<b>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</b>		



## MODULE I – PRIVACY NEEDS ASSESSMENT

*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

**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

### AUTHORITY, IMPACT & NOTICE

<b>1. AUTHORITY</b>  <b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b>	DE-AC07-05ID14517  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."
<b>2. CONSENT</b>  <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>	Individuals do not have the option to decline to provide information.
<b>3. CONTRACTS</b>  <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>	No
<b>4. IMPACT ANALYSIS:</b>  <b>How does this project or information system impact privacy?</b>	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.



## MODULE II – PII SYSTEMS & PROJECTS

<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, S 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>DOE-05</p>
<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>
<b>DATA SOURCES</b>	
<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>Information is provided by the individual.</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>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>Yes, there is a database schema that describes the elements and shows the data relationships for the TRAIN system.</p>
<p><b>DATA USE</b></p>	
<p><b>11. How will the PII be used?</b></p>	<p>PII is used in the system to uniquely identify the individual receiving training.</p>
<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>None.</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>Employee training and qualification history, no PII is included in the standard reports. The system does not have ad-hoc reporting capability.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>Managers and training staff utilize report information to assign resources.</p>
<p><b>16. Who will have access to these reports?</b></p>	<p>All employees have access to standard reports. System administrators have access to create reports of any and all data in the system.</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>



**MODULE II – PII SYSTEMS & PROJECTS**

<b>18. What kinds of information are collected as a function of the monitoring of individuals?</b>	N/A
<b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b>	N/A

**DATA MANAGEMENT & MAINTENANCE**

<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>	PII data is received from Enterprise Directory. Data in TRAIN is updated on a regular basis from this automated feed.
<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>	N/A

**Retention & Disposition**

<b>22. What are the retention periods of data in the information system?</b>	Life plus 75 years.
<b>23. What are the procedures for disposition of the data at the end of the retention period?</b>	TRAIN records are maintained in accordance with federal regulations and company procedures.

**ACCESS, SAFEGUARDS & SECURITY**



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>24. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>Access to the TRAIN system is controlled by the TRAIN administrators. Users complete a request for access to TRAIN. Train administrators determine the level of access required and grant access. Users must log into TRAIN with a provided username and password. The password expires every six months.</p> <p>Access to the servers that contain the databases and scripts that make up TRAIN is limited to individuals who perform maintenance on the system. Access to these systems require the permission of the system owner and are granted by server operations personnel. Once access is granted, the cyber security policies of the INL govern the use of the system.</p>
<p><b>25. Who will have access to PII data?</b></p>	<p>System Administrators only</p>
<p><b>26. How is access to PII data determined?</b></p>	<p>Access is restricted based on roles and need to know.</p>
<p><b>27. Do other information systems share data or have access to the data in the system? If yes, explain.</b></p>	<p>Yes</p> <p>TRAIN is integrated with other applications at the INL, such as Radiological Work Permits, respirator issue, and facility access controls. It also interfaces with Enterprise Directory to obtain employee information.</p>
<p><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></p>	<p>No Interconnection Security Agreements (ISA) exist for TRAIN.</p>
<p><b>29. Who is responsible for ensuring the authorized use of personal information?</b></p>	<p>System Administrators</p>

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>	