



PRIVACY IMPACT ASSESSMENT:  
 BNL PROTECTED CORE INFORMATION SYSTEM  
 PIA Template Version 5 – August 2017

Affects Members Of the Public?	<div style="border: 1px solid black; width: 30px; height: 30px; margin: 0 auto; display: flex; align-items: center; justify-content: center;"> <span style="font-size: 24px; color: blue;">X</span> </div>
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**Department of Energy**

Privacy Impact Assessment (PIA)

## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Date</b>	March 3, 2022
<b>Departmental Element &amp; Site</b>	Office of the Under Secretary for Science and Energy Brookhaven National Laboratory (BNL or Lab) Building 515 Data Center
<b>Name of Information System or IT Project</b>	Protected Core Information System (Protected Core)
<b>Exhibit Project UID</b>	DE-SC0012704
<b>New PIA Update</b>	<input type="checkbox"/> New PIA <input checked="" type="checkbox"/> Update This is a periodic update to the Protected Core Information System.

	Name, Title	Contact Information Phone, Email
<b>System Owner</b>	Robert Gordon, Brookhaven Site Manager  Andrew Ferguson, BSA, ITD Infrastructure & Operations (M&O Contractor)	(631) 344-3346 <a href="mailto:Robert.Gordon@science.doe.gov">Robert.Gordon@science.doe.gov</a>  (631) 344-3246 <a href="mailto:aferguson@bnl.gov">aferguson@bnl.gov</a>
<b>Local Privacy Act Officer</b>	Miriam Bartos, FOIA/Privacy Act Officer	(630) 252-2041 <a href="mailto:Miriam.Bartos@science.doe.gov">Miriam.Bartos@science.doe.gov</a>
<b>Cyber Security Expert reviewing this</b>	Ian Ballantyne, Information Systems Security Manager	(631) 344-7589 <a href="mailto:ballant@bnl.gov">ballant@bnl.gov</a>



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document (e.g. ISSM, CSSM, ISSO, etc.)		
<b>Person Completing this Document</b>	Christine Metz, BNL Privacy Officer	(631) 344-2180 <a href="mailto:cmetz@bnl.gov">cmetz@bnl.gov</a>
<b>Purpose of Information System or IT Project</b>	<p>Protected Core is a business management system that facilitates and secures routine business processes at BNL including payroll, access permissions, and radiation monitoring. Protected Core is a BNL sub-system in the Moderate Risk information system (enclave) that process Personally Identifiable Information (PII), data used in sensitive or proprietary administrative tasks, and the primary BNL business systems including human resources and financials. Protected Core contains employee data including some sensitive PII used for administrative (human resources) purposes including payroll and for the protection of BNL facilities and personnel. Health data is used to monitor radiation exposure and to protect personnel accordingly. Data in the system is protected by a series of administrative, physical, and technical controls and is used to protect BNL facilities, personnel, and data.</p>	
<b>Type of Information Collected or Maintained by the System:</b>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> SSN</li> <li><input checked="" type="checkbox"/> Medical &amp; Health Information</li> <li><input checked="" type="checkbox"/> Financial Information</li> <li><input type="checkbox"/> Clearance Information</li> <li><input type="checkbox"/> Biometric Information</li> <li><input type="checkbox"/> Mother's Maiden Name</li> <li><input checked="" type="checkbox"/> DoB, Place of Birth</li> <li><input checked="" type="checkbox"/> Employment Information</li> <li><input type="checkbox"/> Criminal History</li> <li><input checked="" type="checkbox"/> Name, Phone, Address</li> <li><input checked="" type="checkbox"/> Other – Please Specify: Radiation Exposure Records, Access Control, other Personnel Medical Records</li> </ul>	



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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>N/A. This system is designed to collect and maintain PII.</p>
<p><b>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</b></p>	<p>N/A</p>
<b>Threshold Questions</b>	
<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 (individuals seeking access to BNL facilities)</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>

## END OF PRIVACY NEEDS ASSESSMENT

## MODULE II – PII SYSTEMS & PROJECTS

### AUTHORITY, IMPACT & NOTICE



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## MODULE II – PII SYSTEMS & PROJECTS

<p><b>1. AUTHORITY</b></p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<ul style="list-style-type: none"><li>• 42 USC 2051a</li><li>• 31 USC 1535</li><li>• 42 USC 7101</li></ul>
<p><b>2. CONSENT</b></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>Individuals provide personal information as a term of employment or other relational arrangement with the Laboratory, with the understating that the use of this information is relevant to the business and safeguarding of BNL. The information must be provided if the individual wishes to continue employment or other relational arrangement with the Laboratory in a position that requires access to the respective areas and systems of the Laboratory.</p>
<p><b>3. CONTRACTS</b></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>Yes, under contract BNL Prime Contract, No. DE-SC0012704, under clause H.8 Privacy Act Records.</p>



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<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>Protected Core is identified as a Moderate Risk system. The system presents a potentially significant privacy impact in light of the sensitive PII contained therein including SSN, financial data, and health data. Should sensitive PII in the system be compromised it could cause serious harm to individuals including professional and financial harm as well as personal and reputational harm should health data be compromised.</p> <p>The system observes a number of protections to protect privacy as reflected in the Fair Information Practice Principles (FIPPs). PII is provided by consenting individuals as a term of employment or relational arrangement to further individual participation and transparency. PII is limited to clearly defined business purposes conducted by authorized users. Only PII necessary for business purposes is collected and maintained, and the system does not collect more PII than what is needed for specified business purposes in furtherance of data minimization. Personnel and financial information is available for review and revision as appropriate by the individual to whom the record pertains to further transparency and individual participation. A series of administrative and technical controls are implemented to ensure that the use of PII is protected. Access permissions provide the necessary system restrictions based on need-to-know protocols, and information is only shared in accordance with the Privacy Act. In addition, system protections take into account NIST SP 800-53 guidelines to minimize privacy impacts.</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>The data can be retrieved by the name as well as employee or other access badge number.</p>



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<b>6. SORNs</b>  Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i> ?  If "Yes," provide name of SORN and location in the <i>Federal Register</i> .	DOE-33 (Personnel Medical Records), 74 FR 1032  DOE-35 (Personnel Radiation Exposure Records), 74 FR 1037  DOE-51 (Employee and Visitor Access Control Records), 74 FR 1053  DOE-52 (Access Control Records of International Visits, Assignments, and Employment at DOE Facilities and Contractor Sites), 74 FR 1055
<b>7. SORNs</b>  If the information system is being modified, will the SORN(s) require amendment or revision?	N/A
<b>DATA SOURCES</b>	
<b>8. What are the sources of information about individuals in the information system or project?</b>	All data is individual-provided with the exception of work-related data such as radiation exposure collected from a dosimetry badge used and obtained with the consent of the individual.
<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>	A database schema exists for the database stored in the Protected Core.
<b>DATA USE</b>	
<b>11. How will the PII be used?</b>	Authorized Human Resource, Financial, Medical, and Security personnel will access the information as needed to perform the necessary business processes required by BNL. These processes include payroll, access permissions, and radiation monitoring among.



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<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>	N/A
<p><b>13. With what other agencies or entities will an individual's information be shared?</b></p>	Information will only be shared in accordance with the Privacy Act Routine Uses for DOE-33, DOE-35, DOE-51, and DOE-52.
<b>REPORTS</b>	
<p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	Management of human resource and financial information, medical records, security access, as well as environment, safety, and health functions at the Laboratory.
<p><b>15. What will be the use of these reports?</b></p>	Reports are generated to assist and complete administrative tasks, including human resources and financial overview.
<p><b>16. Who will have access to these reports?</b></p>	Database and System Administrators, Human Resource, Financial, Medical, Security, and Environment, Safety, and Health personnel with role-based permissions granted by senior management to access the data on a need-to-know.
<b>MONITORING</b>	
<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	The system is not used to monitor individuals and provides no such capability beyond what may be derived from contact and employment data.
<p><b>18. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	N/A
<p><b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	A series of administrative and technical controls are implemented to prevent the unauthorized monitoring of individuals. Access permissions provide the necessary system restrictions based on need-to-know protocols, and information is only shared in accordance with the Privacy Act. In addition, system protections take into account NIST SP 800-53 guidelines to the unauthorized use of PII.



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### 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>	The records on individuals are kept current by the respective business units responsible for the information. Personnel and financial information is available for review and revision as appropriate by the individual to whom the record pertains.
<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

### RECORDS MANAGEMENT

<b>22. Identify the record(s).</b>	Medical, radiation exposure, access control (security), Occupational Injury and Illness, and financial records.
<b>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b>	DOE Administrative Records Schedules 1 (medical, radiation exposure, occupational injury, and illness), 18 (access control), and GRS Series 1 and 2.
<b>24. Records Contact</b>	Lauren Heller (631) 344-7692 lheller@bnl.gov

### ACCESS, SAFEGUARDS & SECURITY

<b>25. What controls are in place to protect the data from unauthorized access, modification or use?</b>	A series of administrative and technical controls are implemented to ensure that the use of PII is protected. Access permissions provide the necessary system restrictions based on need-to-know protocols, and information is only shared in accordance with the Privacy Act. In addition, system protections take into account NIST SP 800-53 guidelines to minimize privacy impacts.
<b>26. Who will have access to PII data?</b>	Authorized Database and System Administrators, Human Resource, Financial, Medical Security personnel with role-based permissions granted by senior management.





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<b>27. How is access to PII data determined?</b>	Senior management and other authorized managers grant role-based permissions to access the data based on a need to know for a specified business purpose.
<b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	Select workstations and servers in Shared Services have access to the Protected Core for purposes of web frontend/middleware to specific applications and services.
<b>29. 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>	No.
<b>30. Who is responsible for ensuring the authorized use of personal information?</b>	Senior management and other authorized managers grant role-based permissions to access the data based on a need to know.

**END OF MODULE II**



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SIGNATURE PAGE		
	Signature	Date
<b>System Owner</b>	<p>(Signature)</p> <hr/> <p>(Print Name)</p> <p>Andrew Ferguson <small>Digitally signed by Andrew Ferguson Date: 2022.12.14 13:32:12 -05'00'</small></p> <hr/> <p>(Signature)</p>	<hr/>
<b>Local Privacy Act Officer</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b>Ken Hunt Chief Privacy Officer</b>	<hr/> <p>(Print Name)</p> <p>William K. Hunt <small>Digitally signed by William K. Hunt Date: 2022.12.14 11:17:18 -05'00'</small></p> <hr/> <p>(Signature)</p>	<hr/>