



Affects Members Of the Public?	<input checked="" type="checkbox"/>
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**Department of Energy**

**Privacy Impact Assessment (PIA)**

**MODULE I – PRIVACY NEEDS ASSESSMENT**

<b>Date</b>	7/28/22
<b>Departmental Element &amp; Site</b>	Office of Environmental Management (EM) Fluor Idaho Idaho Cleanup Project - (ICP Core) Idaho National Laboratory (INL) Cloud Application hosted by ADP
<b>Name of Information System or IT Project</b>	Idaho Cleanup Project (ICP Core) - Automatic Data Processing (ADP) Payroll/Human Resources System
<b>Exhibit Project UID</b>	Contract No: DE-EM0004083
<b>New PIA Update</b>	<input type="checkbox"/> <input checked="" type="checkbox"/> Periodic update.

	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	Jamie Miura, Business Services Director	(208) 533-0547 James.Miura@icp.doe.gov
<b>Local Privacy Act Officer</b>	Amy Smith, DOE-ID Privacy Act Officer	(208)526433 smithat@id.doe.gov
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Julianna Joyner, Cyber Security Manager Tracy Anderson, ISSM	(208) 533-1212 Julianna.Joyner@icp.doe.gov (208)533-3331 Tracy.Anderson@icp.doe.gov
<b>Person Completing this Document</b>	Jennifer Robbins, Sr Human Resources Specialist	(208) 557-3383 <u>Jennifer.Robbins@icp.doe.gov</u>



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	Jason Killpack, Assistant Controller KC Sellars, Manager, Records Management	(208) 557-0941 <a href="mailto:Jason.Killpack@icp.doe.gov">Jason.Killpack@icp.doe.gov</a>  (208) 533-3692 <a href="mailto:KC.Sellars@icp.doe.gov">KC.Sellars@icp.doe.gov</a>
<b>Purpose of Information System or IT Project</b>	Fluor Idaho utilizes ADP’s payroll and HR segments, which are collectively referred to as Employer Services, for processing and storing payroll and HR data for Fluor Idaho employees. ADP allows employees to update tax deductions, direct deposit information, address changes, emergency contacts, and contact information. Users have access exclusively to their own PII in the system. A series of physical, technical, and administrative controls are implemented to protect data in the system.	
<b>Type of Information Collected or Maintained by the System:</b>	<input checked="" type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input checked="" 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 checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input checked="" 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, <i>Department of Energy Privacy Program</i> , 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	PII exists in the system.	



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<i>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>	
<b>If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)</b>	N/A
<b>Threshold Questions</b>	
<b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b>	YES
<b>2. Is the information in identifiable form?</b>	YES
<b>3. Is the information about individual Members of the Public?</b>	Only emergency contact information and dependent information for benefit purposes.
<b>4. Is the information about DOE or contractor employees?</b>	YES  <input type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> Contractor Employees

## 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>	<ul style="list-style-type: none"> <li>• Department of Energy Authorization Act, Title 42, United States Code (U.S.C), Section 7101 et. seq.</li> <li>• Federal Information Security Modernization Act of 2014 (FISMA), 44 U.S.C. §§ 3551-3558</li> </ul>
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<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>Information is required as a condition of employment for Fluor Idaho to administer benefits and payroll services to employees. Should an individual decline to provide this information, employment may not proceed.</p>
<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>ADP is a third-party provider. All design, development, and maintenance of the system are conducted by ADP. ADP has access to data in the system on a strictly need-to-know basis for authorized business purposes. Privacy protections and guidelines are reflected in the vendor agreement.</p>
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>ADP poses a moderate privacy impact. The system collects and maintains sensitive PII including SSN and financial information. Should this information be compromised, it could result in significant harm to individuals including professional and financial harm. A compromise of PII may also cause personal and social harm, e.g., if an individual's choice of beneficiaries is disclosed without authorization. The ADP system contains information specific to an individual; when data fields are combined, they may be used for identity theft.</p> <p>A series of physical, administrative, and technical controls are implemented to safeguard PII and to ensure that only authorized uses and access proceed. These controls mitigate the risk of data compromise.</p>



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<p><b>5. SORNs</b></p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>PII can be retrieved by unique identifiers. In Human Resources, various internal reporting is retrieved from the system on an as needed basis. Multiple reporting is retrieved for payroll purposes on a weekly basis.</p>
<p><b>6. SORNs</b></p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<ul style="list-style-type: none"> <li>• OPM/GOV-1 General Personnel Records, 77 FR 73694</li> <li>• DOE-2 Supervisor Maintained Personnel Records, 74 FR 999</li> <li>• DOE-5 Personnel Records of Former Contractor Employees, 74 FR 1003</li> <li>• DOE-28 General Training Records, 74 FR 1029</li> </ul>
<p><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</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>PII is collected from individuals when hired and when qualified changes (e.g., pay, org, benefits, tax withholdings, banking, etc.) occur.</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>Yes, in the electronic document management system.</p>



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### DATA USE

<p><b>11. How will the PII be used?</b></p>	<p>HR data is used to track and monitor benefits, salary, and position for employees and used for business purposes only. Payroll data is used for business purposes only to track and monitor payroll data including weekly payroll, taxes, deduction, and contribution information.</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>IRS, SSA, insurance providers, 401(k) service provider, and the Department of Labor will have access to the data on a need-to-know basis only. Battelle Energy Alliance (BEA) for retirement benefits purposes.</p>

### REPORTS

<p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>Fluor Idaho HR and Payroll staff have the ability to run reporting on individuals or groups of individuals including:</p> <ol style="list-style-type: none"> <li>1. List of active employees to include employee specific information such as: position ID number, benefit enrollments, hire date, termination date, leave status date, address, etc.</li> <li>2. Service Anniversary</li> <li>3. Dependents reaching age 26</li> <li>4. Enrollment counts by benefit plan</li> <li>5. Payroll reports to include name, SSN, salary, etc.</li> </ol> <p>These reporting activities are run only on a need-to-know basis.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>The information is used for self-assessments, tracking, monitoring, and processing and are used for business purposes only.</p>
<p><b>16. Who will have access to these reports?</b></p>	<p>HR and Payroll staff that have a need-to-know to perform their job functions.</p>

### MONITORING



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<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>The system provides no such capabilities beyond what is inherent to address data.</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>Yes. Technical and administrative controls are in place to prevent the miss use of data by individuals with access. Technical controls include restricted access via user-id and password based on user responsibility and job function. All Fluor Idaho personnel are required to complete annual security (include cyber security) refresher training.</p>

### DATA MANAGEMENT & MAINTENANCE

<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>The system is periodically updated by ADP. Individuals have the ability and responsibility to update/maintain data that is specific to them.</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</p>

### RECORDS MANAGEMENT

<p><b>22. Identify the record(s).</b></p>	<p>Official Personnel Files of Contractor Employees. Records consist of employment histories and jobs held by the employee from initial date of employment to date of separation. Personnel, pay actions, and benefit changes.</p>
<p><b>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b></p>	<p>DAA-0434-2020-0010-0003</p>



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<p><b>24. Records Contact</b></p>	<p>KC Sellars</p> <p><u><a href="mailto:KC.Sellars@icp.doe.gov">KC.Sellars@icp.doe.gov</a></u></p> <p>(208)533-3692</p>
<p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>	
<p><b>25. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>Technical and administrative controls are in place to prevent the miss use of data by individuals with access. Technical controls include restricted access via user-id and password based on user responsibility and job function. All Fluor Idaho personnel are required to complete annual security (include cyber security) refresher training.</p>
<p><b>26. Who will have access to PII data?</b></p>	<p>HR and payroll personnel will have access to data in the system to perform their job function. Such access is assigned based on user-id and password protection. A couple of IT personnel will also have access based on job responsibility and trouble shooting.</p>
<p><b>27. How is access to PII data determined?</b></p>	<p>Restricted access to data is determined by evaluation of personnel job responsibilities and functions and approved by authorized management and implemented by authorized system administrators.</p>
<p><b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b></p>	<p>Weekly uploads from Deltek Costpoint (Fluor Idaho’s financial system) to ADP.</p>
<p><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></p>	<p>No formal ISA with Deltek Costpoint.</p>
<p><b>30. Who is responsible for ensuring the authorized use of personal information?</b></p>	<p>System Owners and source module owners are responsible for assuring proper use of the information.</p>

## END OF MODULE II





<b>SIGNATURE PAGE</b>		
	<b>Signature</b>	<b>Date</b>
<b>System Owner</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b>Local Privacy Act Officer</b>	<p><b>Amy Smith</b> (Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b>Ken Hunt</b> <b>Chief Privacy Officer</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>