Affects Members Of the Public? ☐

Department of Energy

Privacy Impact Assessment (PIA)

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	07/28/2022
Departmental Element & Site	Environmental Management (EM) Fluor Idaho, LLC Idaho Cleanup Project (ICP) Idaho National Laboratory (INL) 1580 Sawtelle Street Idaho Falls, Idaho 83402
Name of Information System or IT Project	Idaho Cleanup Project (ICP) – Open Range
Exhibit Project UID	Contract No. DE-EM0004083
New PIA ☐ **Update** X	Periodic update.

	Name, Title	Contact Information Phone, Email
System Owner	Bret 'Duke' Moscon Senior Manager, Safety and Health Fluor Idaho, LLC 1580 Sawtelle St. – MS 9231 Idaho Falls, Idaho 83415.	Use the full phone number and email. For example (208) 533-0236 BretDuke.Moscon@icp.doe.gov
Local Privacy Act Officer	Amy Smith, DOE-ID Privacy Act Officer	Use the full phone number and email. For example (202) 555-1212

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		John.doe@hq.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Debra Nims Fluor Idaho, LLC P.O. Box 1625 Mailstop 9240 Idaho Falls, ID 83415	(208) 351-0574 Debra.Nims@icp.doe.gov
Person Completing this Document	Debra Nims Fluor Idaho, LLC P.O. Box 1625 Mailstop 9240 Idaho Falls, ID 83415	(208) 351-0574 Debra.Nims@icp.doe.gov
Purpose of Information System or IT Project	The CTS Open Range database (OpenRange) is used to document exposure assessments performed by industrial hygiene professionals as part of the Idaho Cleanup Project (ICP) Worker Safety and Health Program required by 10 CFR 851. The database will serve as the repository for documentation of the identification, evaluation, and control of standard industrial hazards that are addressed in the ICP's Safety Management Program for chemical, physical, and biological hazards. Measured exposures to specific hazards for individual workers are organized using a coded identifier for each worker for whom data is collected. The records will be used to provide information about the specific hazards involved for a given task, process, or activity; the relative level of worker exposure to the hazards; and the controls used to mitigate worker exposure to the hazards. Exposure records will be used for compliance with applicable DOE and OSHA regulations for worker exposure records maintenance and accessibility and to help ensure that workers are sufficiently protected. The records will serve as a historical record and support continuing operations.	
Type of Information Collected or Maintained by the System:	☐ SSN ☒ Medical & Health Information ☐ Financial Information	

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	☐ Clearance Information ☐ Biometric Information ☐ Mother's Maiden Name ☐ DoB, Place of Birth ☒ Employment Information ☐ Criminal History ☒ Name, Phone, Address ☐ Other – Please Specify
Has there been any attempt to verify PII does not exist on the system? **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.*	The system contains PII.
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	N/A

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?	NO
4. Is the information about DOE or contractor employees?	☐ Federal Employees ☒ Contractor Employees

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END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

1. AUTHORITY **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	Records of workplace hazard assessments and worker exposure to hazardous chemical, physical, and biological agents are required to be collected and maintained by 10 CFR 851, Worker Safety and Health Program; the Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1020, Access to employee exposure and medical records; and other OSHA regulations for specific substances and activities, such as asbestos work and entry into permit-required confined spaces.
2. CONSENT **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)?**	Workers may decline to assist in the collection of exposure data by refusing to wear sampling devices or equipment; however, the potential benefit of having accurate, relevant data of their exposure to hazardous agents generally results in worker cooperation in the collection of the data.
3. CONTRACTS **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?**	The ICP contract includes the requisite clauses for compliance with the Privacy Act.

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4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	The system contains exposure data for workers who agree to wear equipment to collect exposure data. Workers may refuse to wear equipment used to collect data. Worker consent softens the privacy concerns for the intended use of the system. Nevertheless, should information in the system be compromised or subjected to unauthorized use, it could result in privacy harm to individuals including harm to professional reputation, embarrassment, and psychological or social harm resulting from a breach of exposure data. Information contained in this system will be accessible only by authorized individuals with a need to know. ICP cyber security requirements are compiled with to maintain the appropriate level of security for data in the system. Physical, technical, and administrative controls are implemented to mitigate the risk of breach and to maintain the security and integrity of the system.
5. SORNs **How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?** **If yes, explain, and list the identifiers that will be used to retrieve information on the individual.**	Individual information in this system will be retrievable by name, badge number, job title, work activity, and specific hazard(s) measured or evaluated.
6. SORNs **Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?** **If "Yes," provide name of SORN and location in the *Federal Register*.**	DOE-33 Personnel Medical Records, 77 FR 1032 DOE-35 Personnel Radiation Exposure Records, 77 FR 1037
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	N/A

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DATA SOURCES	
8. What are the sources of information about individuals in the information system or project?	Administrative information on specific individuals will be loaded from ICP contractors' human resources records. Exposure data will be collected via equipment worn by and with the consent of workers.
9. Will the information system derive new or meta data about an individual from the information collected?	Exposure data may inform assessments of worker health status used to protect workers.
10. Are the data elements described in detail and documented?	Yes, data elements are described in detail and documented within the ICP Information Management Organization.
DATA USE	
11. How will the PII be used?	PII will be used to provide workers, industrial hygiene professionals, and occupational medical professionals with information about the specific hazard(s) levels of exposure for an individual. This information will be used to determine necessary controls for worker health protection and to evaluate a worker's health status as it relates to occupational exposure to chemical, physical, and/or biological hazards.
12. If the system derives meta data, how will the new or meta data be used? **Will the new or meta data be part of an individual's record?**	Information in the system will be used to protect workers' health and safety and to assist workers seeking medical care.
13. With what other agencies or entities will an individual's information be shared?	Measured exposures to airborne beryllium are compiled and shared with the DOE Beryllium Associated Worker Registry (BAWR) maintained by the Oak Ridge Institute for Science and Education (ORISE). The data is transmitted to ORISE using an obfuscated identifier for each ICP worker whose exposure measurement(s) are included in the twice-yearly reports. Licensed practitioners supporting the ICP Occupational Medicine Program will also have access to the information.
REPORTS	

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14. What kinds of reports are produced about individuals or contain an individual's data?	The CTS Open Range database can provide reports summarizing measured or represented levels of worker exposure to hazardous chemical, physical, or biological agents. The reports can be generated with or without individual identifiers.
15. What will be the use of these reports?	Information from CTS Open Range is used to document worker exposures, evaluate effectiveness of controls, and assist licensed occupational medicine providers in their assessment of a worker's health status.
16. Who will have access to these reports?	ICP industrial hygiene professionals and licensed occupational medical professionals. Workers whose exposure are directly documented in, or represented by the records, may request copies of their exposure records, but they will not have access to the database directly.
MONITORING	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	This system is used to collect and store data monitoring hazard exposure with the consent of workers.
18. What kinds of information are collected as a function of the monitoring of individuals?	The worker's name, job title and badge number are collected along with actual or representative levels of exposure to occupational hazards such as noise, chemicals, and metal fumes.
19. Are controls implemented to prevent unauthorized monitoring of individuals?	Industrial hygiene professionals record only the information that is needed to assure an accurate record of exposure. Only qualified industrial hygiene professionals collect and enter information into the database. Role-based access controls help ensure that only authorized individuals have access to data in the system.
DATA MANAGEMENT & MAINTENANCE	
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.	Information that is entered into the CTS Open Range data will be subject to internal review to verify accuracy, relevance, and completeness. Exposure data records reflect conditions at the time of assessment or sampling and are considered accurate only for that time.

MODULE II – PII SYSTEMS & PROJECTS	
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	The CTS Open Range database will be operated only by the ICP contractor and will be governed by the contractor's requirements for maintaining security of PII. Exposure records will be used for compliance with applicable DOE and OSHA regulations for worker exposure records maintenance and accessibility.
RECORDS MANAGEMENT	
22. Identify the record(s).	**Records Concerning Personnel Exposure to Hazardous Concentrations of Toxic Chemicals and Other Materials.** Records (including correspondence) prepared in the normal course of business concerning or documenting the exposure of personnel to chemical, physical and/or biological hazards, excluding radionuclides. Records are cut off at the close of the fiscal year in which the employee left employment, at which time they are archived in the system. Records may be destroyed 75 years after cutoff.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	NCI-430-76-9, item 5c NCI-430-76-9, item 5d(1) N1-434-98-4 item 21.2d(2)
24. Records Contact	Danelle Cummings (208)533-0032 Danelle.Cummings@icp.doe.gov
ACCESS, SAFEGUARDS & SECURITY	
25. What controls are in place to protect the data from unauthorized access, modification or use?	The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with DOE Order 205.1 b Change 3, NIST 800.53 R4, and EM RMA-IP Moderate controls. The system was certified and accredited and found to have mitigated risk to an acceptable level. The system employs a series of physical, technical, and administrative controls to protect the data. Role-based access controls ensure that only individuals with an authorized job function access data accordingly.
26. Who will have access to PII data?	ICP industrial hygiene professionals and licensed occupational medical professionals. Workers whose exposures are directly documented in or represented by the records may request copies of their exposure records, but they will not have access to the database directly. Information Technology (IT) personnel who administer and maintain the database will also have access to data in the system for defined job roles.

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27. How is access to PII data determined?	Industrial hygiene professionals and occupational medicine providers with a need to know are granted access to the system. Occupational medicine professionals will have read-only access. Industrial hygiene professionals will be able to input or create records, and will have full access to the database. IT professionals responsible for administration, maintenance, and support of the database are granted access.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	No.
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?	There are no connecting information systems. Human resource data is entered into the system, but Open Range data is not exported into other systems.
30. Who is responsible for ensuring the authorized use of personal information?	Access control is provided through the IT department. Industrial hygiene professionals are provided with a secure log-in ID and passcode. Similarly, occupational medicine providers are provided with a log-in ID and passcode for read-only access. Access is terminated upon transfer to another job function or on termination of employment.
END OF MODULE II	

SIGNATURE PAGE

	Signature	Date
System Owner	**Duke Moscon** **(Signature)**	
Local Privacy Act Officer	**Amy Smith** **(Print Name)** Amy T. Smith Digitally signed by Amy T. Smith Date: 2022.09.06 10:16:26 -06'00' **(Signature)**	
Ken Hunt **Chief Privacy Officer**	**(Print Name)** William K. Hunt Digitally signed by William K. Hunt Date: 2022.08.04 08:59:10 -04'00' **(Signature)**	