Affects Members Of the Public?	X

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: **https://www.directives.doe.gov/directives-documents/200-series/0206.1-BOrder/@@images/file**

Please complete form and return via email to Privacy@hq.doe.gov

No hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	06/09/2022
Departmental Element & Site	U.S. Department of Energy Office of Science Oak Ridge National Laboratory Site Office Oak Ridge National Laboratory
Name of Information System or IT Project	Site Access Control System (SACS)
Exhibit Project UID	
New PIA x **Update**	

	Name, Title	Contact Information Phone, Email
System Owner	Johnny O. Moore Manager ORNL Site Office	(865) 576-3536 johnny.moore@science.doe.gov

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MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Linda Chapman DOE FOIA/Privacy Act Officer DOE Oak Ridge Office	(865) 576-2129 Linda.chapman@science.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Brian Brown ORNL Security Controls Assessor UT-Battelle, LLC Contractor to the US Department of Energy	(865) 574-8688 brownbg@ornl.gov
Person Completing this Document	Dan DeVore ORNL Privacy Officer UT-Battelle, LLC Contractor to the US Department of Energy	(865) 341-1400 devoreds@ornl.gov
Purpose of Information System or IT Project	SACS is an information system at ORNL associated with the following Department of Energy (DOE) Systems of Record: *DOE-51, Employee and Visitor Access Control Records* and *DOE-52, Access Control Records of International Visits, Assignments, and Employment at DOE Facilities and Contractor Sites*. SACS creates and maintains site access control records for employees, non-employees (e.g. visitors, contractors), and foreign nationals who access ORNL facilities. Specifically, SACS is used to manage, track, document, and report on employee, non-employee, and foreign national access to ORNL facilities. SACS is one of the systems at ORNL used to manage access to the Lab. Specifically, SACS is the system that grants physical access to facilities at ORNL—it puts building access on an individual's badge/credential. SACS tracks an individual in that it maintains a log of when an individual's badge/credential is used to enter facilities on ORNL campus. Maintaining these logs is necessary for ORNL to comprehensively manage site access and security and fulfill the requirements of DOE O 142.3B and DOE O 473.1A. Ad hoc building access reports are produced in support of the same requirements (e.g. for security reviews or investigations).	
Type of Information Collected or Maintained by the System:	☒ SSN ☐ Medical & Health Information ☐ Financial Information ☒ Clearance Information ☒ Biometric Information (Badge photo) ☐ Mother's Maiden Name	

MODULE I – PRIVACY NEEDS ASSESSMENT

	☒ DoB, Place of Birth ☒ Employment Information ☐ Criminal History ☒ Name, Phone, Address ☐ Other	
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.*	N/A – PII and Privacy Act Information are known to exist on this information system.	
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	N/A – system is known to contain PII.	

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.

MODULE I – PRIVACY NEEDS ASSESSMENT

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

1. **AUTHORITY** **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	DOE O 142.3B defines the requirements for unclassified foreign national access to all DOE sites. Among other things, DOE O 142.3B requires: (1) a risk-based review and approval process for foreign national access for ORNL and (2) a process for documenting and tracking access by foreign nationals to ORNL. DOE O 473.1A defines site-specific requirements and procedures for receiving and escorting visitors and requirements for security badges to be used to support physical access control operations at DOE facilities. In order to meet the requirements of these orders, ORNL uses SACS to retain the personal information of employees, non-employees, and foreign nationals who access ORNL facilities.

MODULE II – PII SYSTEMS & PROJECTS

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)?**	Failure to provide this information would disqualify an individual from accessing ORNL facilities. There is currently no formalized opportunity for an individual to consent to uses of information beyond what is required or authorized.
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?**	Yes. The ORNL M&O contract includes FAR 52.224-1 Privacy Act Notification, FAR 52.224-2 Privacy Act, and requires compliance with DOE O 142.3B and DOE O 473.1A.
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	DOE has assessed SACS as a moderate risk system for confidentiality, integrity, and availability. SACS maintains personally identifiable information (PII) including the types of PII indicated on page 2 of this assessment. Additionally, the federal information collected and maintained by SACS has been identified by DOE as a Privacy Act System of Record (*DOE-51,* Employee and Visitor Access Control Records and DOE-52, Access Control Records of International Visits, Assignments, and Employment at DOE Facilities and Contractor Sites. SACS is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls: • Strict access control enforcement based on need-to-know
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.**	Yes, the data can be retrieved by searching by unique identifiers of individuals. The data is retrievable by the following identifiers: badge number, name, Social Security Number, Date of Birth.

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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*.**	Yes. Department of Energy Privacy Act of 1974; Publication of Compilation of Privacy Act Systems of Records 74 FR 993, January 9, 2009. DOE-51, Employee and Visitor Access Control Records and DOE-52, Access Control Records of International Visits, Assignments, and Employment at DOE Facilities and Contractor Sites. Pages 993-1090
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	N/A.
DATA SOURCES	
8. What are the sources of information about individuals in the information system or project?	The employees, non-employees (e.g. visitors, contractors), and foreign nationals requesting access to ORNL facilities are the sources of information—the personal information in SACS is collected directly from the individuals and their badges by ORNL.
9. Will the information system derive new or meta data about an individual from the information collected?	No.
10. Are the data elements described in detail and documented?	Yes.
DATA USE	
11. How will the PII be used?	PII is used to document, track, manage, analyze, report on, and control access to ORNL facilities by employees, non-employees, and foreign nationals to meet the requirements of DOE O 142.3B and DOE O 473.1A.
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?**	N/A.

MODULE II – PII SYSTEMS & PROJECTS

13. With what other agencies or entities will an individual's information be shared?	This information will be shared within DOE. As necessary, information may be shared with other agencies or entities as permitted by the applicable SORNs cited below. Department of Energy Privacy Act of 1974; Publication of Compilation of Privacy Act Systems of Records 74 FR 993, January 9, 2009. DOE-51, Employee and Visitor Access Control Records and DOE-52, Access Control Records of International Visits, Assignments, and Employment at DOE Facilities and Contractor Sites. Pages 993-1090
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	SACS does not produce standard reports. Reports about individuals may be produced on an ad-hoc basis in response to requests by authorized ORNL management personnel.
15. What will be the use of these reports?	Ad-hoc reports will be used for data analysis as necessary for ORNL to comprehensively manage site access and security and fulfill the requirements of DOE O 142.3B and DOE O 473.1A.
16. Who will have access to these reports?	Limited, authorized ORNL personnel as necessary to comprehensively manage site access and security and fulfill the requirements of DOE O 142.3B and DOE O 473.1A.
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	Yes.
18. What kinds of information are collected as a function of the monitoring of individuals?	SACS collects and monitors date and time of building access for individuals at ORNL sites.
19. Are controls implemented to prevent unauthorized monitoring of individuals?	Yes – please see controls outlined in questions 25 – 27 below.
DATA MANAGEMENT & MAINTENANCE	

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MODULE II – PII SYSTEMS & PROJECTS

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.	System entries have a standardized format and are time limited. After an access request expires, a new request must be submitted, which requires verification of all PII data previously collected.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A.

Records Management

22. Identify the record(s).	DOE 51 – Title: Employee and Visitor Access Control Files (SOR) DOE-51 Description: Visitor Registers, Foreign National Pink Cards, Visitor Access Control Records, Special Visitors and Group Tours Records, Non-citizen visitor approval cards This has been identified as a System of Records (SOR). DOE 52 – Title: Foreign National Assignments Files (SOR) DOE-52 Description: Foreign National Assignments files with PAS request, approvals, host report, VISA information for length of work assignment. This has been designated as a System of Record (SOR). DOE-52
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	Check appropriately and cite as required. ☐ Unscheduled XX Scheduled (cite NARA authority(ies) below) DOE-51 and DOE-52 are both scheduled under this citation DOE Admin 18:17.1a Files retained by sites (incoming visitor control) with potential for exposure to hazardous material. (N1-434-98-21(17.1a)) Retention: Cut off at the end of the fiscal year. Destroy 75 years after cutoff.

MODULE II – PII SYSTEMS & PROJECTS

24. Records Contact	Missy Baird bairdmh@ornl.gov 865-574-6753

ACCESS, SAFEGUARDS & SECURITY

25. What controls are in place to protect the data from unauthorized access, modification or use?	The Unclassified Cyber Security Program Plan (CSPP) for ORNL is based on the DOE Office of Science Cyber Security Program Plan (CSPP) and implements the technical, operational, and management controls to secure this Information System at a Moderate level. The security controls for this system are based on FISMA requirements to achieve compliance with Federal law and Department of Energy (DOE) policy and to protect the confidentiality, integrity, and availability of this Information System. The Internal Networked Devices (IND) enclave, where this system resides, operates under a current DOE granted Authority to Operate (ATO).
26. Who will have access to PII data?	Authorized security, administrative, and technical support personnel whose official duties require access to the data.
27. How is access to PII data determined?	Level of access is determined through job or role-based authorization and is only granted on a need-to-know basis.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	ORNL's HR information system (Success Factors) and ORNL's Personnel Access System (PAS) transmit encrypted PII to SACS. Transmission of PII between systems is necessary for ensuring only approved and vetted individuals with a valid need-to-know gain access to the laboratory and the associated resources involved with SACS.
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?	N/A – ORNL Information Systems only.
30. Who is responsible for ensuring the authorized use of personal information?	The ORNL Information System Owner (ISO) / Designee(s) of the system.

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
System Owner	_____ (Print Name) Date: 2022.10.29 19:02:28 -04'00' _____ (Signature)	_____
Local Privacy Act Officer	_____ (Print Name) Linda Chapman Digitally signed by Linda Chapman Date: 2022.10.17 15:44:11 -04'00' _____ (Signature)	_____
Ken Hunt **Chief Privacy Officer**	_____ (Print Name) William K. Hunt Digitally signed by William K. Hunt Date: 2022.08.29 13:21:27 -04'00' _____ (Signature)	_____