

**Department of the Interior**  
**Privacy Impact Assessment**

November 22, 2013

**Name of Project:** Drug Testing System  
**Bureau:** Office of the Secretary, Interior Business Center  
**Project's Unique ID:** 010-999991241

Once the PIA is completed and the signature approval page is signed, please provide copies of the PIA to the following:

- Bureau/office IT Security Manager
- Bureau/office Privacy Act Officer
- DOI OCIO IT Portfolio Division
- DOI Privacy Act Officer

**Do not email the approved PIA directly to the Office of Management and Budget email address identified on the Exhibit 300 form. One transmission will be sent by the OCIO Portfolio Management Division.**

**Also refer to the signature approval page at the end of this document.**

**A. CONTACT INFORMATION:**

- 1) Who is the Bureau/Office Privacy Act Officer who reviewed this document?** (Name, organization, and contact information)

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Office of the Chief Information Officer  
U.S. Department of the Interior  
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Washington, DC 20240  
202-208-1605

**B. SYSTEM APPLICATION/GENERAL INFORMATION:**

- 1) Does this system contain any information about individuals?**

Yes. The system contains individuals' names, full or partial social security numbers, agency specific identification numbers, work, home or cellular telephone numbers, gender, city and state of duty station or city and state of residence or zip code. In addition, the system contains drug test results and review and analysis of the results by a Medical Review Officer (MRO).

- a. Is this information identifiable to the individual<sup>1</sup>?** (If there is NO information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

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<sup>1</sup> "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency

Some of the categories of information listed above, such as name and social security number, are identifiable to individuals. Data from other categories in combination may permit the identification of individuals.

- b. Is the information about individual members of the public?** (If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

Yes. Some of the individuals covered by the system are potential employees who have not yet been hired for federal employment.

- c. Is the information about employees?** (If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

Yes. Many of the individuals covered by the system are current employees of DOI and other Federal government agencies who are required to take drug tests as a condition of their employment.

## **2) What is the purpose of the system/application?**

The Drug Testing System (DTS) allows for the scheduling, tracking, and reporting of drug tests for Federal government employees and prospective employees. Federal drug testing and guidelines permit the utilization of pre-employment and periodic random testing for employees in sensitive positions. Federal employees may also be tested on the basis of reasonable suspicion of drug use, and during post-accident follow-up activities. Sensitive positions include jobs with duties or requirements that may directly impact public safety, such as federal law enforcement personnel who carry firearms, or federal employees with transportation-related jobs, such as air traffic controllers, commercial driver's license holders, pilots, and train operators. It also includes individuals whose jobs require access to sensitive or classified information

DTS is used by DOI to test DOI employees and prospective employees who are subject to drug testing, and is also offered to other Federal agencies on a pay for service basis by DOI's Interior Business Center (IBC). DTS was designed by a third party vendor, Pembroke/eScreen (Pembroke). Pembroke continues to host the system, perform system updates, and operate and manage the system.

In addition to the limitations discussed above concerning which employees may be screened for drug use, Federal drug testing activities are governed by standard procedures established by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA) and the Department of Transportation (DOT). These standards include the use of properly accredited labs, guidelines for which substances may be tested, and the use of a Medical Review Officer (MRO) to review drug test results.

All prospective employees for sensitive positions are drug tested. Existing employees in sensitive positions are randomly tested. All federal employees are subject to reasonable suspicion, post-accident, and follow-up testing. To conduct a drug test, urine or breath samples are obtained by a trained collector directly from individuals being tested; the samples are sent to an independent third party lab for analysis. The lab then returns a report to Pembroke that is incorporated into DTS. In cases of non-negative screenings for illegal drugs, the lab report is analyzed by an MRO before a final result is posted in DTS.

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intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

**3) What legal authority authorizes the purchase or development of this system/application?**

Executive Order 12564 (Drug-free Federal Workplace), HHS Mandatory Guidelines, and the Omnibus Transportation Employee Testing Act of 1991 (DOT Procedures 49 CFR Part 40)

**C. DATA IN THE SYSTEM:**

**1) What categories of individuals are covered in the system?**

Current and potential employees from DOI and other federal agencies are covered in this system. Not all potential and current Federal employees are required to submit to drug tests; agencies identify testing designated positions based upon the 2010 Guidance for Selection of Testing Designated Positions memorandum issued by the Department of Health and Human Services and DOT guidance for those in the transportation related positions.

**2) What are the sources of the information in the system?**

Much of the information about current employees is obtained from Federal agency HR and payroll applications such as DOI's Federal Personnel and Payroll System (FPPS) and the HR and payroll systems of other Federal agencies. Information on prospective employees is obtained from the servicing personnel officer. However, virtually all of the information about individuals, except for duty station city and state, agency specific identification number and test results and MRO analysis, is obtained initially from the individual.

**a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

- Information on current DOI employees is from FPPS; other federal employee's information is from their agency payroll/personnel system. This information includes name, full or partial Social Security Number, work telephone number, gender and city and state of duty station.
- Information on applicants is obtained from the servicing personnel officer. This information includes name, full or partial Social Security Number, contact telephone number (home or cellular), gender and city and state of residence.
- Lab result information is obtained from a third-party testing lab.
- Review and analysis of results is provided by the MRO.

**b. What Federal agencies are providing data for use in the system?**

Approximately 65 Federal agencies have used DTS services and have providing data for use in the system. For a full list, please contact the System Manager listed in Section A(3) above.

**c. What Tribal, State and local agencies are providing data for use in the system?**

None

**d. From what other third party sources will data be collected?**

Lab results will be obtained from a third-party lab.

**e. What information will be collected from the employee and the public?**

Virtually all of the information about individuals, except for duty station city and state, as well as test results and MRO analysis, is obtained initially from the individual. This includes:

name, social security number, work, home or cellular telephone numbers, gender, city and state of duty station or city and state or zip code of residence.

### **3) Accuracy, Timeliness, and Reliability**

#### **a. How will data collected from sources other than DOI records and be verified for accuracy?**

Information is collected from DOI and client agency HR and payroll systems, and is not independently verified for completeness when provided for use in DTS. The information is assumed to be verified for accuracy at the point of collection for the applicable HR system. Verification procedures for data in DOI and other Federal agency HR systems are described in the system's privacy impact assessment (PIA). DOI HR system PIAs are available at DOI's Privacy Program web site at the following address - [http://www.doi.gov/ocio/information\\_assurance/privacy/ppia.cfm](http://www.doi.gov/ocio/information_assurance/privacy/ppia.cfm). HR system PIAs from client agencies can be obtained directly from the client agencies.

Information concerning prospective employees is obtained from the servicing personnel officer. This information is not independently verified for accuracy prior to use in DTS; DTS relies on the servicing personnel officer to provide accurate information and to verify the information as necessary.

While information is not independently verified for accuracy, the system provides for validation checks to ensure that the right type of data is being incorporated, and that the length of the data is appropriate (for instance, Social Security Numbers must include 10 numeric digits).

Lab result information is reviewed twice yearly during lab inspections by the Department of Health and Human Services (HHS).

MRO results and analysis information is reviewed by the user agency on a regular basis.

#### **b. How will data be checked for completeness?**

Information is collected from DOI and client agency HR and payroll systems, and is not independently verified for completeness when collected for use in DTS. The information is assumed to be verified for completeness at the point of collection for the applicable HR system. Verification procedures for data in the HR system are described in the system's privacy impact assessment (PIA). DOI HR system PIAs are available at DOI's Privacy Program web site at the following address - [http://www.doi.gov/ocio/information\\_assurance/privacy/ppia.cfm](http://www.doi.gov/ocio/information_assurance/privacy/ppia.cfm). HR system PIAs from client agencies can be obtained directly from the client agencies.

Information for prospective employees is obtained from the servicing personnel officer. This information is not independently verified for completeness prior to use in DTS; DTS relies on the servicing personnel officer to provide accurate information and to verify the information as necessary.

While information is not independently verified for accuracy, the system provides for validation checks to ensure that the right type of data is being incorporated, and that the length of the data is appropriate (for instance, Social Security Numbers must include 10 digits).

Information is collected from agency HR and payroll systems, and is deemed to be complete.

Information for prospective employees is obtained from Information on applicants is obtained from the servicing personnel officer, and is deemed to be complete.

Lab result information is reviewed twice yearly during lab inspections by the Department of Health and Human Services (HHS).

MRO results and analysis information is reviewed by the user agency on a regular basis.

- c. Is the data current?** What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Information is collected from agency HR and payroll systems at the time a drug test is performed, and the most recent available data is obtained from these systems.

Information concerning prospective employees is obtained from the servicing personnel officer. The information is obtained as part of the job application process, and is recently obtained.

Lab result information is reviewed twice yearly during lab inspections by the Department of Health and Human Services (HHS).

MRO results and analysis information is reviewed by the user agency on a regular basis. Data will be checked by talking to agency contacts, employment applicants, and/or Medical Review Officers as necessary. Lab and MRO data are reviewed on yearly basis.

- d. Are the data elements described in detail and documented?** If yes, what is the name of the document?

Yes; all data element descriptions are documented in the DTS' Assessment and Accreditation (A&A).

#### **D. ATTRIBUTES OF THE DATA:**

- 1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Yes. The purpose of the system is to test employees and prospective employees for drug use, and the use of the data is both relevant and necessary for that purpose.

- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

No, the system will not derive or create previously unavailable data about an individual through aggregation from the information collected. However, new data about individuals will be created through the testing process, as test results and MRO analyses are added to the system. This information will be placed in each individual's record and maintained in a secure database.

- 3) Will the new data be placed in the individual's record?**

Yes, the new data about individuals created through the testing process will be placed in each individual's record.

- 4) Can the system make determinations about employees/public that would not be possible without the new data?**

No, the system is not designed to make determinations about individuals. However, the new data obtained through the testing process can be used by managers and supervisors to determine an individual's qualifications for Federal positions that require drug screening.

- 5) How will the new data be verified for relevance and accuracy?**

The new data is deemed to be accurate because samples are handled using proper procedures and a specified and documented chain of custody, and because it is obtained from accredited third party laboratories. Non-negative test results are also subject to MRO review.

**6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

The data is not being consolidated.

**7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

Processes are not being consolidated.

**8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Yes. The data is retrieved by name, social security number, agency specific identification number, specimen number, date, and test type search. These search criteria can be used independently or in combination.

**9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

Reports can be produced that show the status of pending and completed drug/alcohol tests and whether the tests were positive or negative. DTS users (drug program managers) at each client agencies can see reports only for their agency. DTS administrators can view all data in the system.

**10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)**

Individuals can decline to provide their social security number and can instead provide another unique 9-digit identifier.

All individuals are given a privacy notice at time of test. Individuals can decline to participate in the testing process, but their eligibility for Federal employment may be affected.

**E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:**

**1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

The data in the system is stored in one primary location.

**2) What are the retention periods of data in this system?**

Data is maintained in accordance with applicable Records Schedules, NARA and Departmental guidance for this type of data. Positives results are destroyed when the employee leaves the agency or when 3 years old, whichever is later. Negatives results are destroyed when 3 years old. Paper documents are retained for five years.

**3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

Disposition, storage and retention procedures follow applicable guidance by NARA, applicable legislation such as the Federal Records Act, and Departmental guidance.

**4) Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No

**5) How does the use of this technology affect public/employee privacy?**

The impact of the system on employee privacy is minimal, because the collection of information and testing is done knowingly. The data in the system is stored in a secured environment, with limited access granted only to authorized individuals.

**6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

The system does not have the ability to identify, locate and monitor individuals. The system does contain an audit log that can be used to review the actions of users while they are accessing the system.

**7) What kinds of information are collected as a function of the monitoring of individuals?**

The system does not have the ability to identify, locate and monitor individuals. The system does contain an audit log that can be used to review the actions of users while they are accessing the system. This information includes user identification, time of access, and a list of files and data elements accessed.

**8) What controls will be used to prevent unauthorized monitoring?**

Access to the system is restricted to authorized personnel with valid user IDs and passwords. User accounts allow authorized personnel to only access the data for their agency or department. The DTS system is accessed through the Internet via Secure HTTP (HTTPS), which provides an encryption layer to prevent unauthorized access over the Web. In addition, all DOI IBC users must complete Federal Information System Security Awareness (FISSA), Privacy and Records Management training before being granted access to any DOI IT resource, and annually thereafter. All DTS administrative staff must also complete role based security training.

**9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

Privacy Act System of Record Notices OPM/GOVT-10 – Employee Medical File System of Records and OPM/GOVT-5 – Recruiting, Examining and Placement Records.

**10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.**

Not applicable – the system is not being modified.

**F. ACCESS TO DATA:**

**1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)**

Personnel who have access to DTS are authorized Federal agency personnel (typically drug program managers and their support staff), DOI drug program personnel and servicing personnel officers, and contractors and third-party labs that provide services for DTS or the drug testing process.

**2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

Each agency identifies authorized users on a strict need to know basis. Authorized users are granted access via ID and password and tracked via audit trail. All DOI users undergo initial and annual Security Awareness Information Technology training.

**3) Will users have access to all data on the system or will the user's access be restricted? Explain.**

User accounts allow authorized agency personnel to access only the data for their agency or department. Use is granted on a basis of least privileges, where users are granted access to the minimal amount of data needed in order to perform their job duties. In addition, passwords and other safeguards further protect access.

**4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)**

User accounts/roles allow authorized agency personnel to access only the data for their agency or department based on their job function. In addition, user responsibilities are defined, a unique user id and password is assigned, the privacy act notice is posted on the login screen, and all activity is tracked via audit logs.

**5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

The application was designed and developed by Pembroke, and Pembroke continues to host the system, perform system updates, and operate and manage the system. Privacy Act contract clauses were included in Pembroke's contract.

**6) Do other systems share data or have access to the data in the system? If yes, explain.**

Lab test data is collected from third-party lab systems is then uploaded to DTS. As discussed previously, some of the data about individuals is provided by DOI HR systems such as FPPS and client agency HR systems.

**7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

Drug & Alcohol Testing Branch employees are responsible for DOI employees and potential employees. Individual Agencies are responsible for their employees and potential employees.

**8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other (e.g., Tribal))?**

Client agencies have access only to their respective data in read only mode

**9) How will the data be used by the other agency?**

DTS will be used to schedule, track, and report drug/alcohol tests for employees of their agency.

**10) Who is responsible for assuring proper use of the data?**

Agencies and their respective users are responsible for proper use of the data.