NOAA Marine Operations Health Services Database

Privacy Impact Assessment Statement
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National Oceanic and Atmospheric Administration
NOAA Marine Operations Health Services Database

Privacy Impact Assessment Statement

Project: NOAA Marine Operations Health Services Database

Unique Project Identifier: 006-03-02-00-01-0511-04

IT Security System: NOAA2010

Project Description:

Health screening is required for all members of the public before they are cleared to participate in NOAA Marine and Aviation Operations (NMAO) sea missions, as observers, media representatives or researchers. A specific example of a program for which health screening is required is “Teacher at Sea (TAS).” The mission of TAS is to give teachers a clearer insight into our ocean planet, greater understanding of marine work and studies, and increased environmental literacy by fostering an interdisciplinary research experience. The program provides a unique environment for learning and teaching by sending kindergarten through college-level teachers to sea aboard NOAA research and survey ships to work under the tutelage of scientists and crew. Since its inception in 1990, the program has enabled more than 430 teachers to participate in this program to enrich their classroom curricula with the experience, knowledge and resources they have acquired. To learn more about this program, go to: http://teacheratsea.noaa.gov/.

In order to obtain clearance to work or travel on board any of the vessels, health screening is also required for all NMAO employees/prospective employees.

The OMAO Medical Office has replaced a paper system of the NOAA Health Service Questionnaire (NHSQ), with a modern and secure Web-based system for the completion and review of NHSQs. This medical history database contains essential information about the health of scientists, teachers at sea, and qualified non-crewmembers participating in research and survey missions on behalf of NOAA. Only the individual whose medical history is being recorded and the medically authorized medical providers may enter information into the files, and only the providers are able to access that information.

This PIA has been developed to comply with the requirements in Section 208 of the E-Government Act of 2002 (44 U.S.C. 36) and the Department of Commerce IT Privacy Policy.
1. **What information is to be collected (e.g., nature and source)?**

Both personally identifiable information and medical information are collected. The personal and medical information collected is pertinent to the stated purposes for which the information is used. Only information that is required to determine fitness for sea/flight duty is to be collected.

This database will contain information collected under the Paperwork Reduction Act: Office of Management and Budget (OMB) Control No. 0648-0283, Teacher at Sea Program. Collection of this information is consistent with the support for research and education under the National Marine Sanctuaries Act* (16 U.S.C. 32, Section 1440) and NAO 209-124, Effective: 1 October 2006, Issued: 22 June 2006.

The categories of information in the NHSQ are:

- **Identification/Contact Information** - Name, address, date of birth (year only), work address; e-mail address; position in program; home, work and cell telephone numbers; cruise dates. Identifying information is collected only for individuals with whom medical personnel has interacted; these names will be linked to other medical information that may be required.
- **Next of kin names and contact information in case of emergencies.**
- **Medical** – Medical information that may be submitted by the individual involved or other medical providers as needed. Screening forms request information about allergies, dietary restrictions, medications, date; type of test and result of most recent tuberculosis test; date of last tetanus booster; functional abilities screening questions; active health problems, major surgeries/hospitalizations, past medical events, mental health events or conditions, and cardiac risks and events; major surgeries, hospitalizations and/or emergency room visits; awareness of medical condition which could affect suitability for sea duty.

2. **Why is the information being collected (e.g., to determine eligibility)?**

The Office of Marine and Aviation Operations (OMAO) has created a new system to ensure that individuals who embark on OMAO ships are not putting themselves or others at risk due to medical conditions that are beyond the capabilities of the ships/aircraft to handle. The electronic NHSQ system allows medical personnel quicker access to more complete medical data. The effectiveness of the medical officers’ review depends on this rapid access to complete medical information about embarked personnel. This information is important in potentially life-and-death medical situations.
In the course of meeting its responsibilities, the medical department collects and maintains information on individuals with whom the medical department has interacted. These include individuals who wish to embark on OMAO vessels.

3. What is the intended use of the information (e.g., to verify existing data)?

The information will be used to (1) detect instances of medical conditions that are incompatible with embarkation, and (2) develop case files to determine fitness to embark on OMAO vessels on future missions. These files include medical information provided on the NHSQ and additional supporting documentation provided by the individual.

4. With whom will the information be shared (e.g., another agency for a specified programmatic purpose)?

Medical information is shared only with authorized users who have a legitimate need to know. These records or information contained therein may specifically be disclosed as a routine use as stated below. The medical department is authorized to make the determination as to the relevancy of a record prior to its decision to disclose a document.

A record in the medical department may be disclosed:

- to the legal department to determine legal sufficiency of a denial for embarkation or in response to litigation;
- in response to a court order;
- to other health care providers involved in the case;
- in response to statute (e.g., sexually transmitted disease, homicidal ideation, suicidal ideation, child abuse, elder abuse, etc.);
- to the OMAO leadership involved in the waiver process; and
- to the individual involved.

5. 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 may individuals grant consent?

Information provided is completely voluntary, however, failure to provide complete information requested will not allow the medical department to make a fitness to embark determination.
6. How will the information be secured (e.g., administrative and technological controls)?

*Management Controls:*

Medical information can be accessed by authorized medical personnel. NOAA does a thorough background investigation on all of its personnel with a National Agency Check with Inquiries (NACI). Medical data can only be accessed via a secure NOAA network; both the network and the application require passwords that are issued only to those who require access to the system. Paper records related to the medical database are maintained in locked file cabinets at medical facilities in Tampa, FL, Seattle, WA (two locations), Norfolk, VA, and Silver Spring, MD. NOAA identification badges are required for entry.

An IT Security Certification and Accreditation (C&A) review was successfully conducted for this system, and is current and in force. The C&A process is an audit of policies, procedures, controls, and contingency planning that is required to be completed for all federal government IT systems before they can become operational. Additionally, there is a current IT Security Plan for this system.

*Operational Controls:*

Operational controls include securing all server and communications hardware and software associated with the NOAA Data Centers. The Data Centers are tightly controlled by card entry and staff to restrict access to the servers, their operating systems and databases. There are contingency operating plans in place, including alternative processing sites at secure locations in accordance with Continuity of Operations planning for the U.S. Department of Commerce, NOAA’s parent agency. Backups are performed on the processing databases every production day (Monday through Friday). The backups include all file directories (except the operating system directory) and databases. Additional operational controls include: (1) logical edit checks to ensure proper sequence of actions; (2) full auditing of all system transactions; (3) ability to “lock” sensitive files so that only specific authorized personnel have access, or even know about, the sensitive files; and (5) restricted access.

*Technical Controls:*

The medical database can be accessed though computers at NOAA facilities or via laptop computers carried by medical personnel. Desktop computers at NOAA facilities are protected because, as mentioned above, entry into the facilities requires an authorized NOAA badge. The computers used by medical personnel will be password protected so that unauthorized users cannot gain access to files or to the medical database. To access the medical database, the user must first access a secure NOAA national network. Network access requires a current...
password. Once on the network, the user must have an additional password to access the medical database application. The IT System Administrator is responsible for issuing medical database passwords.

The medical database is a browser-based system using the secure socket layer (SSL) protocol. This means that information is entered into screens presented to the users after they have logged on to the electronic NHSQ. The information is not retained in the user’s computer once it is entered into the medical database. Medical personnel at remote locations, such as on board a vessel, can review this information securely over the internet. Because of the password protection explained above, this information is not accessible to unauthorized users.

Data Extract Log and Verify

As indicated above, the NMAO Health Services Database System does not allow users to extract data and download it to their personal computers. Users are only allowed to access and view data. An automated access audit log is created and monitored daily, and the logs are retained indefinitely.

7. Is a system of records being created under the Privacy Act, 5 U.S.C. 522a.?  
Yes. A system of records notice was submitted to and is under review by the Department of Commerce Privacy Act Officer.

8. Are these records covered by an approved records control schedule?  

The records schedule for NMAO personnel health records is 311-02, NOAA Corps Official Personnel Files (OPFs). The individual's OPF is placed in an inactive file upon retirement, resignation, or death of the individual, and is transferred one year later to the National Personnel Records Center (CPR), St. Louis, Missouri.

The electronic and paper health screening records for members of the public, including visitors and prospective employees, are not covered by an approved records schedule at this time. A records schedule will be developed in consultation with the NOAA Records Manager, no later than October 2009.

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