

DOD PRIVACY IMPACT ASSESSMENT FOR NTPR IT SYSTEM

Ref: OSD-CIO ltr, "DoD PLA Guidance" of 28 Oct 2005

1. **DoD Component:** Defense Threat Reduction Agency (DTRA)
2. **Name of IT System:** Nuclear Test Personnel Review (NTPR)
3. **Budget System Identification Number:** 5012
4. **DITPR Identification Number:** AQES0003
5. **IT Investment (OMB Circular A-1 1) Unique Identifier:** N/A
6. **Privacy Act System of Records Notice Identifier:** HDTRA010
7. **OMB Information Collection Requirement Number (if applicable) and Expiration Date:** Application in process for OMB requirement number.
8. **Type of authority to collect information:** 38 U.S.C. 1154 and 1112 (Veterans Benefits) assigns Defense Nuclear Agency (now Defense Threat Reduction Agency (DTRA)) as executive agent for the Nuclear Test Personnel Review Program and delineates Department of Veterans Affairs presumptive and non-presumptive radiogenic disease compensation. 42 U.S.C. 2210 describes the Department of Justice radiogenic disease compensation program that DTRA also supports.
9. **Provide a brief summary or overview of the IT system:** NTPR provides access to a comprehensive database of participation and dose information for over 400,000 participants in United States atmospheric nuclear testing (1945-1962), with the occupation forces of Hiroshima and Nagasaki, Japan, or were prisoners of war in Japan at the conclusion of World War II. and the occupation of Hiroshima and Nagasaki. The NTPR Program has many elements designed to assist military and civilian test participants, to help the Department of Veterans Affairs (VA) and the Department of Justice (DOJ) in responding to claims, and to provide information to organizations responsible for studies concerning the health effects of ionizing radiation. These elements include the following:
 - (a) Researching participation and establishing a register of DoD participants;
 - (b) Collecting and analyzing all known sources of recorded dosimetry and radiation data applicable to participants, and reconstructing doses in cases where recorded doses are unavailable or incomplete;
 - (c) Maintaining a comprehensive database of participation and dose information, along with supporting archival materials and documents;

- (d) Conducting an extensive public outreach program to ensure maximum interface with the supported participants;
 - (e) Maintaining the history of each U.S. atmospheric nuclear weapons test operation;
 - (f) Supporting studies to determine whether participants experience adverse health effects as a result of their test activities; and
 - (g) Providing accurate and timely responses to requests for information from incoming inquiries.
10. **Describe what information in identifiable form will be collected and the nature and source of the information:** Name, rank, grade, service number, social security number, date of birth, last known or current address, dates and extent of test participation, exposure data, unit of assignment, medical data, and documentation relative to administrative claims or civil litigation.
11. **Describe how the information will be collected:** Information is collected by hardcopy (Department of Veterans Affairs (VA), Department of Justice (DOJ), DTRA, & Veteran correspondence), and by telephone interview.
12. **Describe the requirement and why the information in identifiable form is to be collected:** The NTPR Program collects privacy act information to assist military and civilian test participants and to help VA and DOJ in responding to claims. Personal identification data (name, rank, grade, service number, social security number, date of birth) is used to uniquely identify the individual. This is crucial when dealing with a population of approximately 460,000 personnel. Historical military data (i.e. orders, unit histories) is collected to positively establish the individual's participation. Radiological scenario information is collected to assist in the formulation of a participant's radiation dose estimate.
13. **Describe how the information in identifiable form will be used:** The information will be used to certify the identity of individuals so DTRA can provide verification of participation to VA and DOJ. Radiological scenario information will be used in the formulation of a participant's radiation dose estimate (provided to the individual and/or the VA).
14. **Describe whether the system derives or creates new data about individuals through aggregation:** To a negligible extent, new data is created through aggregation. Specifically, information in dose reconstructions prepared for veterans exposed to radiation under similar participation scenarios. For example, two veterans served in the same boiler room on a ship during a nuclear detonation in the Pacific Proving Grounds, so the exposure data for one veteran may be used in the determination of a dose estimate for the second veteran.

15. **Describe with whom the information in identifiable form will be shared, both within the Component and outside the Component (e.g., other DoD Components, Federal agencies, etc.):** Privacy Act information will only be shared with federal employees associated with the following organizations and their authorized contractors: Department of Defense, Department of Veterans Affairs, Department of Justice, Department of Labor, Department of Energy, Department of Health and Human Services, Veterans' Advisory Board on Dose Reconstruction and under the 'Blanket Routine Uses' published at the beginning of DTRA's compilation of systems of records notices: http://www.dod.mil/privacy/dod_blanket_uses.html

Non-Privacy Act information may be shared with the National Research Council of the National Academy of Sciences.

16. **Describe any opportunities individuals will have to object to the collection of information in identifiable form about themselves or to consent to the specific uses of the information in identifiable form. Where consent is to be obtained, describe the process regarding how the individual is to grant consent:** Consent to collect veteran information is requested either by the Department of Veterans Affairs, Department of Justice, or through the veteran's signature on DTRA Form 150, "Nuclear Test Personnel Review Information Request and Release." The veteran's release of information to VA, DOJ, or DTRA is completely voluntary. However, failure to provide the requested information may delay or preclude the potential administration of veteran benefits.
17. **Describe any information that is provided to an individual, and the format of such information (Privacy Act Statement, Privacy Advisory) as well as the means of delivery (e.g., written, electronic, etc.), regarding the determination to collect the information in identifiable form:** The NTPR Program provides Privacy Act Statements (PAS) to veterans as written correspondence through three vehicles: (a) responses to personal requests, (b) copies of correspondence provided to VA or DOJ, and (c) requests for veteran review and verification of the DTRA prepared "Scenario of Participation and Radiation Exposure." The PAS includes Federal Statutes and/or Executive Orders that authorize the maintenance of the system, the purpose for maintaining the system, the routine uses describing to whom the information is being disclosed and whether providing the information is voluntary or mandatory.
18. **Describe the administrative/business, physical, and technical processes and controls adopted to secure, protect, and preserve the confidentiality of the information in identifiable form:** Paper records, microfilm/fiche, and the IT system (servers and workstations) are located in an area accessible only by authorized personnel. Buildings are protected by security guards and/or intrusion alarm systems. Access to the IT system is controlled through software applications which require validation prior to use. The IT system has been certified by DTRA Information Assurance personnel (POC: Mike Roth) as satisfying current DoD Directive 8500.1

“Information Assurance.” All unclassified privacy act records are disposed of in accordance with DTRA Instruction 5200.01, “Information Security Program” as controlled, unclassified waste.

19. **Most recent IT system of records notice Federal Register notice:** "Nuclear Test Participants (August 9, 2005, 70 FR 46154)":
<http://www.dod.mil/privacy/notices/dswa/HDTRA010.html>
20. **Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals. Describe/evaluate further any risks posed by the adopted security measures:** As noted in paragraph 18, the NTPR Program maintains rigorous security over its information (both in electronic and written formats) so there are no potential privacy risks regarding collection, use, and sharing of the information in identifiable form. When DTRA must release information to a veteran that includes information about other veterans, e.g. ship's rosters or morning reports, the Privacy Act information is physically redacted on provided correspondence.
21. **State classification of information/system and whether the PIA should be published or not. If not, provide rationale. If a PIA is planned for publication, state whether it will be published in full or summary form:** The NTPR IT system is unclassified. PIA should be published and it will be published in full form.

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