

Department of Justice  
Justice Management Division



**Privacy Impact Assessment Addendum**  
for the  
Justice Security Tracking and Adjudication Record System  
(JSTARS): COVID Check Module

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## **EXECUTIVE SUMMARY**

The COVID Check module resides within the Justice Security Tracking and Adjudication Record System (JSTARS). COVID Check will allow the Department of Justice (DOJ or the Department) to meet its COVID-19 vaccination attestation requirements mandated by the *Safer Federal Workforce Task Force COVID-19 Workplace Safety: Agency Model Safety Principles* issued by the Office of Management and Budget on July 29, 2021. The initial JSTARS Privacy Impact Assessment (PIA) was approved on May 2, 2008,<sup>1</sup> and amended on April 14, 2010,<sup>2</sup> December 17, 2011<sup>3</sup> and May 7, 2018.<sup>4</sup> This PIA Addendum to the JSTARS PIA was prepared because the COVID Check module, which will provide a mechanism for individuals to submit personal medical information in identifiable form into a separate module within JSTARS, constitutes a significant change to the JSTARS information system.<sup>5</sup>

The original version of the COVID Check PIA Addendum was approved on August 12, 2021. This updates the earlier version of that Addendum, reflecting changes to the system that have taken place in the meantime, including its integration with the Sharepoint system.

## **Section 1: JSTARS Background**

JSTARS is a secure, web-based application accessible over the DOJ network, which automates the tracking of personnel security investigation activities for the DOJ. JSTARS is used by personnel security staff to process personnel security and medical information and transactions on employees, contractors, and other personnel processed for fitness, suitability, and eligibility for a security clearance, and/or eligibility to occupy a sensitive position.

Personnel security tasks accomplished within JSTARS include, but are not limited to: processing pre-employment waivers of prerequisite investigations; processing reciprocity requests; adjudicating initial background investigations and re-investigations for fitness, suitability and/or eligibility to occupy a sensitive position; and processing National Security Information clearances, Sensitive Compartmented Information access requests, and clearance certifications. JSTARS is currently used by all components of the Department.

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<sup>1</sup> The JSTARS PIA can be found at: <https://www.justice.gov/sites/default/files/jmd/legacy/2014/02/24/pia-jstars-05022008.pdf>.

<sup>2</sup> The April 2010 JSTARS PIA Addendum can be found at: <https://www.justice.gov/sites/default/files/jmd/legacy/2014/07/06/jstars-pia-addendum.pdf>.

<sup>3</sup> The December 2011 JSTARS PIA Addendum can be found at: <https://www.justice.gov/sites/default/files/jmd/legacy/2013/09/22/jstars-pia-addendum2.pdf>.

<sup>4</sup> The May 2018 JSTARS PIA Addendum can be found at: [https://www.justice.gov/JSTARS\\_iReport/download](https://www.justice.gov/JSTARS_iReport/download)

<sup>5</sup> Unless otherwise indicated in this PIA Addendum, the COVID Check module incorporates the documented assessments conducted and published in the JSTARS PIA and its addenda.

## **Section 2: Description of COVID Check and the Information it Collects**

COVID Check is a new module within JSTARS that will enable the DOJ workforce to attest to their COVID-19 vaccination status. The COVID Check module resides in the JSTARS infrastructure—a High Risk/unclassified system that is Certified, Accredited, and FISMA compliant.

Individuals who have undergone their prerequisite security vetting to work in the Department will access the COVID Check module through a webpage placed on the intranet sites of their respective DOJ components, as well as through the use of an application deployed to the employee's government-furnished cellular telephone.

Upon clicking on the webpage link, users will be asked to provide their the last five digits of their Social Security Account Number (SSN) and their date of birth. This information is required in order for JSTARS to confirm the identity of the individual and then open a separate COVID Check case file, maintained separately from the employee's personnel security file.

COVID Check may collect, maintain, use, and disseminate personnel medical information as described in the JSTARS PIA and its addenda. Such information may include, but is not limited to: full name; SSN; vaccination status; the nature and dates of vaccinations the individual may have received; and COVID-19 test results.

Department personnel will utilize the COVID Check module to submit their COVID-19 vaccination attestation in a secure centralized location, instead of emailing or otherwise sending the attestation to their supervisor, avoiding the risks associated with broad distribution of sensitive health information in a variety of components' email systems.

## **Section 3: How COVID Check Information will be Used and Shared**

All Department employees will be required to complete and attest to the accuracy of their answers to a set of questions concerning their COVID-19 vaccination status. Specifically, through the COVID Check module, each user, after submitting their identifying information, and identifying their supervisor, will select one of four options: (1) I have been fully vaccinated, (2) I have started but not yet completed the vaccination process, (3) I have not been vaccinated, or (4) I decline to respond. An employee who declines to respond will be treated as if he or she is unvaccinated. Each employee will be required to attest to the accuracy and truthfulness of the information provided in the form and acknowledge that they have read the notice provided pursuant to the Privacy Act. Once the information is submitted to COVID Check, it will be maintained in JSTARS and exported to a Sharepoint<sup>6</sup> site for analysis where it will only be accessible by the designated recipient of COVID-19 vaccination attestations for the specified

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<sup>6</sup> JMD's use of Sharepoint has been examined under separate privacy documentation.

component and JSTARS or Sharepoint system administrators. The information submitted by the individual will be maintained in an electronic case file which is entirely separate from their personnel security case file within the JSTARS system, with access limited to system administrators and specifically authorized individuals with a need to know an individual's COVID status.

Each individual's vaccination attestation will be used to determine the required health and safety guidelines that the individual must adhere to when in a Department worksite, and to allow the individual's supervisor to ensure the individual adheres to these guidelines. The vaccination attestation information will be retained in accordance with the Department's System of Record Notices, including, but not limited to, JUSTICE/JMD-025, Personal Public Health Emergency Records System, 86 Fed. Reg. 20739 (4-21-2021).

In addition to the use of this personally identifiable information for supervisory purposes, the data entered by individuals will also be used to generate Department-wide as well as component-specific vaccination statistics that will be used for workforce health and safety planning, oversight and accountability functions, and other policy making activities.

#### **Section 4: Legal Authorities, Policies, or Agreements**

- Executive Order No. 13,991, *Protecting the Federal Workforce and Requiring Mask-Wearing*, issued January 20, 2020.
- *Safer Federal Workforce Task Force COVID-19 Workplace Safety: Agency Model Safety Principles*, issued July 29, 2021.
- Executive Order No. 12,196, Occupational Safety and Health Programs for Federal Employees, issued February 26, 1980.
- 5 U.S.C. 7902, Occupational safety and health programs for Federal employees.

#### **Section 5: Privacy Impact**

JSTARS currently maintains sensitive background investigation information including personally identifiable information on DOJ employees, contractors, volunteers, consultants, and other individuals whose background investigations are adjudicated by DOJ. The integration of iReport in 2018 resulted in a new medium of collecting information from individuals regarding their background investigations, and additional information being received and added to the security file of these same individuals. The addition of the COVID Check module will expand the current data collection beyond security information to encompass an individual's medical information, primarily their COVID-19 vaccination status.

The information received in JSTARS will be safeguarded by the same procedures outlined in the existing JSTARS PIA and its addenda. Consistent with the JSTARS PIA and its addenda, in all cases, information will be collected, used, maintained, and disseminated in accordance with the Privacy Act, 5 U.S.C. § 552a (2012). Individuals will be provided with a Privacy Act Statement

stating the reasons for collecting information, the consequences of failing to provide the requested information, and explains how the information is used. In addition, notice is provided to the public of the existence of this system through System of Records Notices, including, but not limited to, JUSTICE/JMD-025, Personal Public Health Emergency Records System, 86 Fed. Reg. 20739 (4-21-2021). Information that is exported to Sharepoint will only be accessible to specifically authorized individuals with a need to know the specific medical information of Department personnel.

Prior to choosing to utilize the COVID Check module to collect, retain, and analyze the COVID-19 vaccination status of the Department workforce, a variety of automated options were considered, including commercially available third-party applications. The Justice Management Division evaluated the security, applicability, and potential privacy impact of these options before determining that the COVID Check module provided the most accessible and secure option for collecting and storing this type of personal medical information. The integration of the COVID Check module into JSTARS appears to provide better protections for personal privacy than other available alternatives, such as the uncontrolled distribution of medical information on components' email servers. Furthermore, the statistical information it will make available, will allow the Department's leadership to exercise more effective oversight and accountability of this program, and ultimately protect the health and safety of the Department's workforce.