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Department of the Energy
Evaluation of Privacy Impacts for I-MANAGE STARS

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Name of Project: I-MANAGE STARS
Bureau: Department of Energy
Project's Unique ID: 019-60-01-01-01-1010-00-402-124
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A. CONTACT INFORMATION:

1) Who is the person completing this document? (Name, title, organization and contact information).
Laura Kramer, U.S. Department of Energy, ME-13, 19901 Germantown Rd., Germantown, MD 20874, 301-903-9932, laura.kramer@hq.doe.gov

2) Who is the system owner? (Name, organization and contact information).

Susan J. Grant
Director, Office of Management, Budget, and Evaluation
Chief Financial Officer
Email: Susan.Grant@hq.doe.gov
Phone number: (202) 586-4171

3) Who is the system manager for this system or application? (Name, organization, and contact information).
Laura Kramer, U.S. Department of Energy, ME-13, 19901 Germantown Rd., Germantown, MD 20874, 301-903-9932, laura.kramer@hq.doe.gov

4) Who is the IT Security Manager who reviewed this document? (Name, organization, and contact information).
Leroy Valentine, U.S. Department of Energy, ME-13, 19901 Germantown Rd., Germantown, MD 20874, 301-903-2300, Leroy.valentine@hq.doe.gov

5) Who is the Bureau/Office Privacy Act Officer who reviewed this document? (Name, organization, and contact information).
Abel Lopez, U.S. Department of Energy, Director, Freedom of Information Act and Privacy Act Group, ME-74, 1000 Independence Avenue, S.W., Washington, DC 20585, 202-586-5955

B. SYSTEM APPLICATION/GENERAL INFORMATION:

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

a. Is this information identifiable to the individual[1]?
(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). **Yes**

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, the system contains information about DOE contractors, vendors and current and former DOE employees.**

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

2) **What is the purpose of the system/application?**
The purpose of the I-MANAGE Standard Accounting and Reporting System (STARS) is to provide the Department of Energy with a centralized Departmental financial system. The system will replace the Department's legacy financial system, Departmental Integrated Standardized Core Accounting System (DISCAS) and the Management Analysis Reporting System (MARS), with a modern, comprehensive and responsive financial management system that will electronically integrate financial accounting, financial reporting, cost accounting, and performance measurement. This system will provide critical strategic support for the DOE mission as the solution for financial, operational, and reporting requirements to enhance accountability and improve decision-making. This corporate financial system will be integrated with other major corporate business systems including procurement and human resources.

Implementation of this system will allow DOE to perform general ledger, purchasing (for funds control), accounts payable, accounts receivable and fixed assets functions and responsibilities. The system offers state-of-the-art technologies for high performance online transaction processing and high-volume, automated batch processing.

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[1] "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 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).

C. DATA in the SYSTEM:

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

The categories of individuals include employees, former employees, current & former contractor employees, and vendors who are either due money from or owe money to the Department of Energy (DOE).

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

    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?

Personal employee information is not obtained from individuals, but is obtained from the following sources:
- Travel Manager Plus interfaces with the system to process an input file created by the local Travel Manger System, and creates the accounting entries required to process employee travel expenses.
- CHRIS provides obligation data for training.
- Government Travel System interfaces with the system to process the site's GTS airline tickets and creates ticket entries and payment transactions. A weekly file containing detailed ticket data and a monthly file containing invoiced ticket data reconciled by the travel agent are sent to the DOE site for processing.
- DOE/C-WEB and Small Business System interfaces with the system to check funding availability, commit, and obligate funding, and update the obligation with the vendor profile when the procurement is awarded to a vendor.
- DOEInfo: Employee extracts information from the DOEInfo repository and updates the I-MANAGE STARS employee tables in the Human Resources module, the banking tables in the Accounts Payable module, and the vendor tables in the Purchase Order module.

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

The Department of Treasury and Federal Reserve Bank provide personal data for use in the system.

    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?

None

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

None. Information is not being collected from the public or employees. However, the system contains information that is maintained in other systems that was collected from individuals.

3) Accuracy, Timeliness, and Reliability

    a. How will data collected from sources other than DOE records be verified for accuracy? b. How will data be checked for completeness? 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).

The system software is designed to automatically verify the accuracy, including whether the data is current, and completeness of data input to the system. The system will compare the data inputted to baseline data in the system that has been verified. For example, a name, address and tax payer identification number would be checked against the system baseline data, which are DOE records collected and verified by other DOE systems prior to being placed in STARS. If this information does not match the baseline data, transactions involving this data will fail and a notification requiring corrective measures and actions will be sent to the system administrator. This may involve manual verification and correction of data in the system.

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

Data elements are described in the I-MANAGE STARS design documentation.

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?

All data collected is relevant and necessary for DOE to perform its required financial and cost accounting responsibilities.

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

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

NA

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

NA

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

No new data will be derived or created from unavailable data about an individual.

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

Data is not being consolidated in this system. Data containing privacy information is transferred to the system from other established systems for the purpose of conducting accounts payable and receivable transactions. Controls have been established to protect access to all of the data in the system. See section F of this evaluation.

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

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.

Data may be retrieved by name, taxpayer identification number, voucher, invoice or payment reports.

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

The system will generate invoice monitoring and payment status reports, and reports for the Department of Treasury that contain personal information.

These reports will be used to verify, certify and batch payments and monitor the status of invoices. Access to these reports will be restricted to employees based on their job responsibilities and functions as defined in "Access Control Policies and Procedures for the Department of Energy I-MANAGE Program-STARS Project."

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.)

In order for individuals to be reimbursed for products and services provided, they are required to provide this information. This information is used only to perform the required accounting functions.

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?

Consistent use of this system across the DOE complex will be maintained by requiring user training and providing users with system operational documentation.

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

Data retention for this system is conducted in accordance with DOE Administrative Records Schedule 6: Accountable Officers Accounts Records, dated 6/17/02. (see http://cio.doe.gov/RBManagement/Records/PDF/RS-DOEADM06.PDF)

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?

The procedures for disposition of data in the system are defined in DOE Administrative Records Schedule 6: Accountable Officers Accounts Records, dated 6/17/02. (see http://cio.doe.gov/RBManagement/Records/PDF/RS-DOEADM06.PDF)

4) Is the system using technologies in ways that the DOE 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?

There is no affect. DOE is not using any technologies in a way it has not previously employed.

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

No

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

For security purposes system audit logs are maintained to record system activity and user activity. This activity includes invalid logon attempts and access to data.

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

I-MANAGE STARS developed policies and procedures for controlling and monitoring access to the system. These are defined in "IT0031, ARC 309 Access Control Policies and Procedures for the Department of Energy I-MANAGE Program-STARS Project."

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

DOE-18 Financial Accounting System

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

Yes, the Privacy Act systems of records DOE-18 and DOE-19 will be combined and DOE-18 will be renamed to "Financial Accounting System." DOE-19 will be eliminated. These modifications are made to implement a new financial management system, I-MANAGE STARS.

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)

DOE Federal and contractor personnel will have access to the data in the system. Access to personal data in the system will be strictly controlled based on job responsibility and function.

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

Access to data is determined by evaluation of personnel job responsibilities and functions. Based on the evaluation, access control lists are documented and applied to the system. System controls and integrity reports are reviewed on a regular basis to ensure users have the appropriate level of access.

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

Access will be restricted by job roles and responsibilities.

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)

Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The technical controls include restricted access via user-id and password based on user responsibility and job function. These access controls are defined in "IT0031, ARC 309 Access Control Policies and Procedures for the Department of Energy I-MANAGE Program-STARS Project." All system team members (Federal and contractor) are required to take the DOE standard cyber security certification course as a necessary prerequisite for the system access. Rules of behavior and consequences for violating the rules are displayed to the user each time the user logs onto the system. Administrative controls include non-disclosure agreements, separation of duties so individuals only have access to appropriate pieces of personal information, and use of system audit logs to monitor access and user activity in the system.

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?

Contractors are involved in the design, development, and maintenance of the system. Personal information from I-MANAGE STARS may be disclosed as a routine use to these contractors and their officers and employees in performance of their contracts. Those individuals provided information under this routine use are subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need to know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and the requirements of the DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.

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

The I-MANAGE STARS system interfaces with several systems that may share personal employee information. These systems are listed below in one of three categories: Inbound, Outbound, and Inbound/Outbound. Inbound means that data only flows in one direction - from STARS to the system. Outbound means that data only flows in one direction - from the system to STARS. Inbound/Outbound means that data flows in both directions between the system and STARS:

Inbound
- Travel Manager Plus
- CHRIS
- Government Travel System
- DOE-Info: Employee

Outbound
- Electronic Certification System
- Host-to-Host
- 1099 Process
- Vendor Inquiry Payments Electronic Reporting System

Inbound/Outbound
- DOE/C-WEB and Small Business System

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

Director, Office of Management, Budget and Evaluation/Chief Financial Officer

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

Required accounting and financial information will be shared with Department of Treasury and Federal Reserve Bank.

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

To pay current and former federal employees and contractor and vendor employees for products and services provided.

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

System Owner

<u>See Attached Approval Page</u>

The Following Officials Have Approved this Document

1) System Manager

(signature) _____ (Signature) _12/10/04_ _(Date)

   Name: Laura Kramer

   Title: I-MANAGE STARS Project Manager

2) Privacy Act Officer

(signature) _____ (Signature) _12/18/04_ _(Date)

   Name: Abel Lopez

   Title: Freedom of Information Act and Privacy Act Officer

3) Chief Information Officer

(signature) _____ (Signature) _2/1/05_ _(Date)

   Name: Rosita Parks

   Title: DOE Chief Information Officer