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Department of Energy
Privacy Impact Assessment (PIA)

Name of Project: I-MANAGE Strategic Integrated Procurement Enterprise System (STRIPES)
Bureau:
Project Unique ID: STRIPES
Date: July 15, 2008

A.   CONTACT INFORMATION

1. Who is the person completing this document?

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2. Who is the system owner?

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B.   SYSTEM APPLICATION/GENERAL INFORMATION

1.	**Does this system contain any information about individuals? Yes.**

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

        Yes. STRIPES collects the individual's name, system role, and business address information (street address, phone, and e-mail) of entities who are authorized to do business with the Department of Energy.

    b.	**Is the information about individual members of the public?**

        Yes. The system contains information about DOE contractors and recipients (this is the term used by the Federal Assistance Award Data System - FAADS) as it relates to conducting business with the Department of Energy. Unless an award is made, these individuals are considered to be members of the public.

    c.	**Is the information about DOE or contractor employees?**

        No.

2.	**What is the purpose of the system/application?**

The purpose of STRIPES is to provide the Department of Energy with a centralized enterprise acquisition and financial assistance system. STRIPES provides the tools to assist in the planning, requisitioning, reviewing, awarding, and administering of procurement and financial assistance award instruments. STRIPES tracks both acquisition and financial assistance awards.

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

Department of Energy Authorization Act, 42 U.S.C. 7101 SEQ. 52, USC 2401 at seq.; Code of Federal Regulations, Title 48, Chapters 1 (the Federal Acquisition Regulation) and 9 (Department of Energy Acquisition Regulation); the Office of Federal Procurement Policy Act of 1974, 41 U.S.C. 425 and 10 CFR 960 (Department of Energy Financial Assistance Regulation).

C.	**DATA IN THE SYSTEM**

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

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[1] "Identifiable Form" - According to the OMB Memo M-02-22, 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 descriptor).

STRIPES collects the individual's name, system role, and business address information (street address, phone, and e-mail) of DOE entities who are authorized to do business with the Department of Energy.

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

    a. **Is the source of the information from the individual or is it taken from another source?**

In the case of sole proprietorships, the only source of data that identifies individuals is the Central Contractor Registration (CCR, http://www.ccr.gov/), which is the registrant database for the U.S. Federal Government. The CCR collects, validates for completeness, stores, and disseminates data in support of agency acquisition missions, including Federal agency contract and assistance awards. Note that the term "assistance awards" includes grants, cooperative agreements, and other forms of Federal assistance. Whether applying for assistance awards, contracts, or other business opportunities, all entities are considered "registrants."

Note that the CCR itself does not validate the content of the data; parts of the data are validated by the Internal Revenue Service (IRS) and the U.S. Small Business Administration (SBA), for example.

Individuals are exempt from CCR registration.

Both current and potential Federal government registrants are required to register in CCR in order to be awarded contracts by the Federal government, per FAR 4.11, CCR. Registrants are required to complete a one-time registration to provide basic information relevant to procurement and financial transactions. This registration is required to be maintained as current, and reviewed and updated at least annually. In addition, entities (private non-profits, educational organizations, state and regional agencies, etc.) that apply for assistance awards from the Federal Government through Grants.gov must now register with CCR as well.

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

STRIPES will receive information from CCR, Grants.gov, and I-MANAGE Standard Accounting and Reporting System (STARS). The Federal Agencies responsible for these systems are GSA, HHS, and the Department of Energy, respectively.

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

None. STRIPES does not receive information from these entities for purposes of conducting transactions in STRIPES.

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

None.

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

No personal information is collected directly from the public. STRIPES will be collecting responses to Requests for Proposal (RFPs), Requests for Quote (RFQs), Requests for Information (RFIs), and financial assistance applications, as well as direct queries from DOE contractors, none of which contain personal information.

STRIPES collects the Tax Identification Number from registered users of CCR if a contract is awarded.

3.   **Accuracy, Timeliness, and Reliability**

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

Vendors are required to be registered with the CCR to obtain a Federal award and to receive payment. (FAR Subpart 4.11). Vendors are required to maintain this information as current, and review and update (if necessary) the information provided to the CCR at least annually. The vendors are responsible for the accuracy of the information in the CCR, not the Department of Energy or any other government entity.

The CCR validates the registrant information for completeness and electronically shares the secure and encrypted data with the Federal Agencies' finance offices to facilitate paperless payments through electronic funds transfer (EFT). Additionally, CCR shares the data with Federal government procurement and electronic business systems.

Individuals are exempt from CCR registration.

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

Vendors are required to be registered with the CCR to obtain a Federal award and to receive payment (FAR 4.11). Vendors are required to maintain this information and to review and update (if necessary) the information provided to the CCR at least annually. The vendors are responsible to the accuracy of the information in the CCR, not the Department of Energy.

The CCR validates completeness of initial entry (i.e., no partially filled records will be accepted at the CCR entry point). STRIPES relies on the information already validated by CCR.

c. **Are the data current? What steps or procedures are taken to ensure the data are current and not out-of-date?**

Registrants must update or renew their registration at least once per year to maintain an active status. Additionally, the STRIPES system will regularly retrieve Vendor information as necessary to ensure that it is up-to-date.

d. **Are the data elements described in detail and documented?**

The PRISM Data Dictionary contains the data elements described and documented in some detail. PRISM is the COTS software on which the STRIPES application is based.

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 contract solicitation and award activities.

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?**

N/A.

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

No.

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

N/A.

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

N/A.

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

N/A.

8. **How will 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.**

    The information will be retrieved from CCR via the vendor's TIN and DUNS Number.

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

    N/A.

10. **What opportunities do individuals have to decline to provide information (e.g., where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?**

    Each individual Vendor has a choice as to which information they provide to the CCR. The decision to place personal versus business information into the CCR is at the sole discretion of the person submitting the information.

    In order for a sole proprietorship to be awarded a Federal acquisition or financial assistance award and be reimbursed for products and services provided to the Department of Energy, they are required to register with the CCR. This information is used only to perform the required procurement and financial functions.

    Individuals are exempt from CCR registration.

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 the 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?**

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 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?**

N/A.

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

STRIPES does not have the capability to identify, monitor, or locate individuals.

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

N/A.

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

N/A.

9. **Under which PA system of records notice does the system operate?**

DOE-82 – Grant and Contract Records for Research Projects, Science Education, and Related Activities.

10. **If the system is being modified, will the PA system of records notice require amendment or revision?**

N/A.

F. **ACCESS TO DATA**

1. **Who will have access to the data in the system?**

DOE Federal and contractor acquisition 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.

With the exception of the TIN, the other CCR information accessed by DOE Federal and contractor employees is available to the public.

2. **How is access to the data by a user determined?**

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. The document "ARC 309 STRIPES Access Control Procedures" more completely documents access controls.

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

Access will be restricted by job roles and responsibilities. A least-privilege methodology will be used to assign rights and privileges.

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

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-STRIPES Project." All system team members (Federal and contractor) are required to take the DOE standard cyber security certification course as a 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 and 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 PA contract clauses included in their contracts and other regulatory measures addressed?**

Contractors who are involved in the design and development may be involved in the maintenance of the system. Personal information from STRIPES 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 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 STRIPES application will be integrated with several internal DOE systems as well as external Federal systems, as shown in the figure below. STRIPES will primarily invoke interfaces on the external Federal systems to send or retrieve information, but it will invoke and provides interfaces for integration with internal systems such as STARS. STRIPES will be the controlling entity of all flow data from STRIPES.
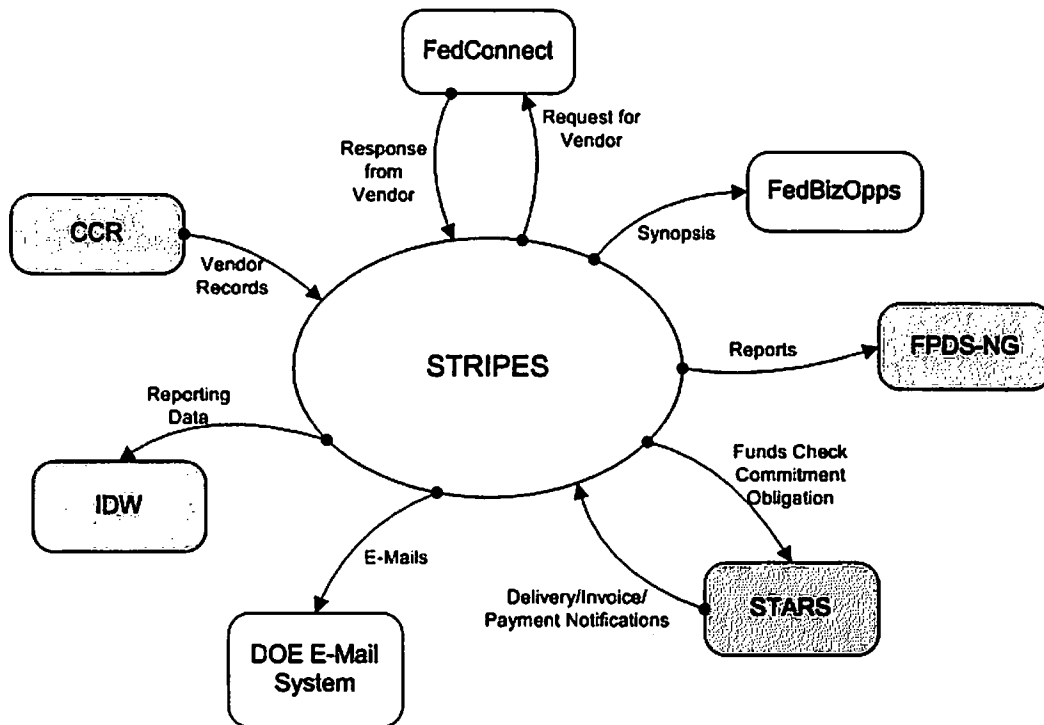
7. **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

System Owner

8. **Will other agencies share data or have access to the data in this system?**

No

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

N/A

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

The System Owner, as identified on the following approval page.

PIA Approval Signatures

Original copy signed and on file with the DOE Privacy Office.