

Section I

Department of Energy Privacy Impact Assessment (PIA)

Name of Project: Purchasing Accounting Reporting Information System
Bureau: Department of Energy
Project's Unique ID: PARIS
Date: August 6, 2008

A. CONTACT INFORMATION:

1) Who is the person completing this document?

Name: John Adams
Title: Senior Applications Software Engineer
Organization: Software Control International
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2) Who is the system owner?

Name: Lynn Humphreys
Title: BJC Procurement
Organization: Bechtel Jacobs Company LLC
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3) Who is the system manager for this system or application?

Name: David D. Newton
Title: Applications Manager
Organization: Bechtel Jacobs Company LLC
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4) Who is the IT Security Manager who reviewed this document?

Name: David Rose
Title: Cyber Security & Compliance Manager
Organization: Bechtel Jacobs Company LLC
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5) Who is the Privacy Act Officer who reviewed this document?

Name: Amy Rothrock
Title: Privacy Act Officer
Organization: Department of Energy/Oak Ridge Operations
Address: 200 Administration Rd.
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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? Yes

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

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

2) What is the purpose of the system/application?

The PARIS application is a procurement/financial credit card system that uses GE Capital software.

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

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C. DATA in the SYSTEM:

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

Contractor and former contractor (public)

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?

The individual is the direct source of the data, however GE Capital receives and returns the information to PARIS.

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

None

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?

GE Capital uses individual supplied SSN from PARIS and returns it with the employee's corporate credit card information.

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

This application collects (from employees) the following:
SSN

3) Accuracy, Timeliness, and Reliability

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

BJC Procurement personnel review the data that is received from GE Capital. The SSN is used as the security code by the individual when they activate their account with GE Capital.

b. How will data be checked for completeness?

BJC applications require a complete set of data for processing purposes. BJC Procurement personnel check the data for completeness when the new account is setup in PARIS.

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

Yes. BJC Procurement personnel close accounts with GE Capital that are no longer active. The inactive accounts are moved to a 'cancelled' organization in the PARIS database to segregate them from the active accounts.

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

No, PARIS does not have a data dictionary.

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? Yes

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/public that would not be possible without the new data? N/A

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

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

7) If processes are being consolidated, are the proper controls remaining 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.

Data can be retrieved from forms in the application or directly from the database. Data on the individual can be retrieved by name, SSN, or credit card account number.

9) What kinds of reports can be produced on individuals?

The Purchasing Card Individual Cardholder Application and the Cardholder Agreement forms are the only documents that contain the SSN. These documents are manually filled out by Procurement personnel and are not generated by the application.

What will be the use of these reports?

The forms are used to setup credit card accounts for individuals with GE Capital.

Who will have access to them?

Reports are available to functional staff as needed to perform their job.

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)?

Individuals do not have to provide the information, because they are not required to obtain a corporate credit card. Information is required in order to obtain a corporate credit card.

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?

The applications do not cross Accreditation Boundaries.

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

There are no defined retention periods; the data is kept in the database indefinitely.

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?

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Data will be archived or deleted at the end of the contract based on DOE guidelines for retaining records. Reports are kept in locked cabinets in a secure area in K-1007. Disposition of report records would also fall under DOE guidelines.

- 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? No.**
- 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?
No monitoring is possible outside of normal applications usage.**
- 9) Under which Privacy Act system of records notice does the system operate? N/A**
- 10) If the system is being modified, will the Privacy Act 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?**
Access to data is controlled by the applications administrators for each application. The PARIS administrators are the only ones who have access to the SSN, and that access is by connecting directly to the database.
- 2) How is access to the data by a user determined?**
Access to data is approved by the application owners and granted by the application administrator on a need-to-know basis.
- 3) Will users have access to all data on the system or will the user's access be restricted?**
User access is controlled by the system administrators by granting roles to individuals. Roles are restricted to see only the functionality/data required by that role.
- 4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

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Application owners enforce separation of responsibilities to only allow access to functionality/data necessary to perform job functions.

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 included in their contracts and other regulatory measures addressed? Yes, DOE Privacy Act clauses are included.

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

GE Capital transfers a file to PARIS that includes the SSN. Other applications do not pull the SSN from the PARIS database.

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

Any applications that process Privacy Act data are classified as “Protected” by the BJC Cyber Security Manager. Those applications then document and test the controls necessary to protect the interfaces/data.

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

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

GE Capital uses the data to setup charge card accounts for individuals and to process transactions for those accounts.

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

The BJC Procurement organization and GE Capital

PIA Approval Signatures

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