

Department of Energy
Privacy Impact Assessment

Name of Project: Savannah River Nuclear Solution (SRNS) Integrated Budgeting, Accounting and Reporting System (IBARS) – Savannah River Site (SRS) Site Applications Accreditation Boundary

Bureau: Department of Energy – Savannah River Operations Office (DOE-SR)

Project's Unique ID: UPI Code: 019-10-01-15-01-1057-00

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A. CONTACT INFORMATION:

1) Who are the person(s) 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 individual¹? 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 IBARS is the core financial system, which substantiates obligations and payments to individuals, and vendors for goods and services received by the contractor. In addition, the IBARS records and manages accounts payable and accounts receivable. The Labor Distribution System (LDS), Manual Voucher System (MVS), Power Quantity Cost Distribution (PQCD) system, and Work Authorization System (WAS) are feeder systems to IBARS, which also support these objectives.

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

Department of Energy Organization Act of 1977 (42 U.S.C. 7101 *et seq.*); Export Administrative Act of 1979 (50 U.S.C. 2401 *et seq.*); the General Accounting Office Policy and Procedures Manual; Statement of Federal Financial Accounting Standards published by the GAO and the Office of Management and Budget; Debt Collection Improvement Act of 1996; 31 U.S.C. 3512; 5 U.S.C. 5701-09; Federal Property Management Regulations 101-107; Treasury Financial Manual; Executive Order 12009; and Executive Order 9397.

C. DATA IN THE SYSTEM:

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

The IBARS covers the current and former contractor employees, vendors, and others that are due money from the Savannah River Nuclear Solutions, as funded through contractor letters of credit issued by the DOE/NNSA.

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?** The IBARS collects data from various sources. It collects information provided by the individual to whom it pertains. Examples include, but are not limited to, name, social security number, user id, organization codes and activity codes. In addition, it collects direct and indirect cost of labor, non labor, material and other ledger sub accounts costs.
- 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

¹ "Identifiable Form" – According to the OMB Memo M-02-22, this means information in an IT system or online collections: (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).

- d. **From what other third party sources will data be collected?** None
- e. **What information will be collected from the individual and the public?** The IBARS collects name, Social Security number, amounts due, contract number, accounting information, and accounting number, amount and status of claim.

3) Accuracy, Timeliness, and Reliability

- a. **How will data collected from sources other than DOE records be verified for accuracy?** The IBARS collects data directly from numerous systems including the Procurement Cycle System, Field Material Tracking System, Maintenance Logic System, Accounts Receivable and Cash System, Integrated Budget System, Time Attendance Collection Systems, and Asset Management Information System. Therefore, the data collected is determined it is accurate at the time it was provided.
- b. **How will data be checked for completeness?** The data in the IBARS is manually and electronically reviewed for completeness. Therefore, the data collected is determined it is complete at the time it was provided.
- c. **Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?** No
- d. **Are the data elements described in detail and documented?** The vendor's database describes and documents the data elements.

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. All data collected is relevant and necessary for continued operation of the site IBARS.
- 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

- 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.

- 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 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.**

Yes. The IBARS can retrieve data by using name, social security number, or the site's computer-generated alternate ID (Comp_Alt_ID).

- 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 authorized user can generate a variety of reports for use by the appropriate local, state, or Federal agencies, when that record alone or in conjunction with other information, indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature, and whether arising by general statute or particular program.

- 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)?**

Collection of the information in the IBARS is required to be able to document the money due from the Savannah River Nuclear Solutions, as funded through contractor letters of credit issued by the DOE/NNSA. Furthermore, the appropriate local, and state and federal agencies will use certain records maintained in the IBARS to ensure Departmental compliance with other regulatory requirements. Access to or use of the information provided will be limited to authorized individuals for required management and reporting.

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 system is licensed by and operated for DOE-SR.

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

Retention periods are in accordance with applicable DOE and National Archives Records Administration (NARA) record schedules. Additional information can be obtained at <http://cio.energy.gov/records-management/adminrs.htm>.

- 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?**

Retention periods are in accordance with applicable DOE and National Archives Records Administration (NARA) record schedules. Additional information can be obtained at <http://cio.energy.gov/records-management/adminrs.htm>.

- 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?**

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?**

N/A

- 9) **Under which Privacy Act system of records notice does the system operate?**

DOE-18 Financial Accounting System

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

No

F. ACCESS TO DATA:

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

Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, and state and federal agencies will use certain records maintained in the IBARS to ensure Departmental compliance with other regulatory requirements. Access to or use of the information provided will be limited to authorized individuals for required management and reporting.

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

The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals.

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

User's access will be restricted based on the need for access to data.

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 administrative controls include annual training emphasizing that it is the individual's responsibility to protect data that they have access to, and that misuse of that data will not be tolerated. Technical control is achieved via roles within the application.

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?

Contractors are involved in the configuration and implementation and maintenance of the system. Personal information may be disclosed to these contractors and their officers and employees in performance of their contracts. Those individuals provided this type of information is subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Pertinent 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?

Yes. The LDS, MVS, and PQCD are feeder systems to IBARS.

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

The system owner for other systems to have access to data within the IBARS application must grant permission. Once provided, it is the responsibility of the other system owners to protect the data provided by IBARS.

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?

N/A