Template - January 30, 2009, Version 2

Department of Energy
Privacy Impact Assessment (PIA)

Affects Members Of the Public?	X

Guidance is provided in the template. See DOE Order 206.1, *Department of Energy Privacy Program,* Appendix A, Privacy Impact Assessments, for requirements and additional guidance for conducting a PIA:
http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf

Please complete electronically: no hand-written submissions will be accepted.

Module I – Privacy Needs Assessment

Date	April 21, 2009
Departmental Element & Site	Office of the Chief Financial Officer, Office of Corporate Information Systems, CF-40 Germantown, U.S. Department of Energy, DOE Headquarters, Germantown, hosted in the OCIO's Application Hosting Environment (AHE) in the CA-007 server room.
Name of Information System or IT Project	iManage Strategic Integrated Procurement Enterprise System (STRIPES) STRIPES is a module within the Integrated Management Navigation System (iManage) enclave, a major general support system (GSS).
Exhibit Project UID	019-60-01-01-01-1028-00 STRIPES is incorporated in the CF iManage Exhibit.

	Name, Title	Contact Information Phone, Email
System Owner	Douglas L. Baptist Director – Information Management Systems Division, Office of Procurement and Assistance Management	202-287-1658 douglas.baptist@hq.doe.gov
Privacy Act Officer	Jerry Hanley Chief Privacy Officer, U.S. Department of Energy	(202) 287-1563 Jerry.Hanley@hq.doe.gov

Module I – Privacy Needs Assessment

Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Phil Knopp	(301) 903-0364 Phil.Knopp@hq.doe.gov
Person Completing this Document	Douglas L. Baptist Director – Information Management Systems Division, Office of Procurement and Assistance Management	202-287-1658 Douglas.Baptist@hq.doe.gov
Purpose of Information System or IT Project	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.	
Type of Information Collected or Maintained by the System:	☐ SSN - Social Security number ☐ Medical & Health Information e.g. blood test results ☒ Financial Information e.g. credit card number Note: credit card information is stored in STRIPES for individual purchase card users; however, the credit card numbers are for DOE corporate accounts, which would not be considered personal information. ☐ Clearance Information e.g. "Q" ☐ Biometric Information e.g. finger print, retinal scan ☐ Mother's Maiden Name ☐ DoB, Place of Birth ☐ Employment Information ☐ Criminal History ☒ Name, Phone, Address – it is business-related information ☒ Other – Vendor's Tax Identification Number (TIN) and DUNS Number (Note – the DUNS number is public information) No personal information is collected directly from the public.	

Module I – Privacy Needs Assessment

	STRIPES collects responses to Requests for Proposal (RFPs), Requests for Quote (RFQs), Requests for Information (RFIs), and financial assistance applications, as well as through direct queries of DOE contractors, none of which contains personal information – it is business-related information. STRIPES 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. STRIPES collects the Tax Identification Number (TIN) from registered users of CCR if a contract is awarded. With the exception of the TIN, the other CCR information accessed by DOE Federal and contractor employees is available to the public.
Has there been any attempt to verify Information about an Individual in Identifiable Form does not exist on the system? *OMB 03-22 defines Information in identifiable form* as 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).	No
If "Yes," what method was used to verify the system did not contain Information in Identifiable Form? (e.g. system scan)	N/A

Threshold Questions

1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?	Yes
2. Is the information in identifiable form?	Yes
3. Is the information about individual members of the public?	Yes
4. Is the information about DOE or contractor employees?	Yes

If the answer to the **all** four (4) Threshold Questions is "**No**," you may **proceed to the signature page** of the PIA. Submit the completed PNA with signature page to the CPO.

Module I – Privacy Needs Assessment

For information systems that collect, maintain or disseminate information in identifiable form from or about members of the public, please complete Modules II and III. Module II must be completed for all systems if the answer to any of the four (4) threshold questions is "Yes." All questions must be completed. This template may not be modified. If appropriate, an answer of N/A may be entered.

The goal of the threshold questions is to legitimately and efficiently determine whether additional assessment is necessary. If there is doubt, it is in the System Owner's best interest to complete Module II (and III if necessary).

Module II – System Information for All Systems

1. **What categories of individuals are collected or maintained by the information system?**	☐ Federal Employees ☒ Contractor Employees ☒ Members of the Public - Individuals in non-employee or contractor context. This includes individuals for whom DOE maintains information, as required by law, who were previously employed or contracted by DOE. ☒ Other, Please Specify - STRIPES collects the individual's name, system role, and business address information (street address, phone, and e-mail) of entities that are authorized to do business with the Department of Energy. 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.

Module II – System Information for All Systems

2.	What is the source(s) of information about individuals in the information system?	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. |
3.	With what other agencies or entities will an individual's information be shared? How will the information be used?	Information regarding individuals is not shared.
4.	Is the use of the information in identifiable form both relevant and necessary for the mission of the organization and DOE?	All data collected is relevant and necessary for DOE to perform contract solicitation and award activities.
5.	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.

REPORTS

Module II – System Information for All Systems

6. What kinds of reports are produced about individuals or that contain an individual's data?	None.
7. What will be the use of these reports?	N/A
8. Who will have access to these reports?	N/A

MAINTENANCE

9. If the information 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.
10. What are the retention periods of data in the information 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)
11. What are the procedures for disposition of the data at the end of the retention period?	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)
12. How does the use of this information system affect privacy? Consider also the use of emerging technologies and how those technologies may impact privacy.	N/A

ACCESS

Module II – System Information for All Systems

13. What controls are in place to protect the data from unauthorized access, modification or use?	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.
14. If processes are being consolidated, do the proper controls remain in place to protect the data and prevent unauthorized access?	Data in STRIPES are not being consolidated.
15. Who will have access to this information system and its data (all data)? Will other agencies share data or have access to the data in this system? How will the data be used by the other agency?	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.
16. Who will have access to information in identifiable form or and PII?	DOE Federal and contractor acquisition personnel have access to the data in the system.
17. How is access to the data 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.

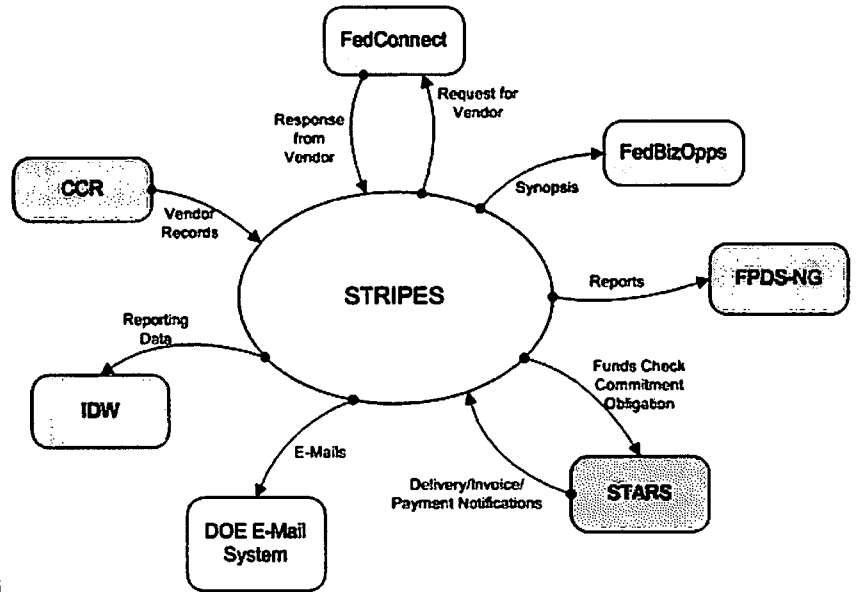## Module II – System Information for All Systems

18. Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts?	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.

Module II – System Information for All Systems

	The STRIPES application is 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.
19. Do other information systems share data or have access to the data in the system? If yes, explain.	
20. For connecting information systems, is there an ISA other agreement between System Owners to ensure the privacy of individuals is protected?	Yes
21. Who is responsible for assuring proper use of the information system's information in identifiable form?	The System Owner, as identified above.

Module III – Systems with Information About Members of the Public

1.	What legal authority authorizes the purchase, development or maintenance of this information system?	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).
2.	Has a Privacy Act System of Records Notice been published in the Federal Register? If "Yes," provide name of SORN and location in the Federal Register.	DOE-82 – Grant and Contract Records for Research Projects, Science Education, and Related Activities.
3.	If the information system is being modified, will the SORN require amendment or revision?	N/A
4.	How will data collected from sources other than DOE records be verified for accuracy, relevance and completeness?	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. |
| 5. | Are records in the system about individuals current? What steps or procedures are taken to ensure the data is current? | Yes. 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. |
| 6. | Will the information system derive new or meta data about | No |

Module III – Systems with Information About Members of the Public

an individual through aggregation from the information collected? How will this be maintained, including verified for relevance completeness, and accuracy?	
7. Will the new or meta data be part of an individual's record?	N/A
8. How will the new or meta data be used? Will it be used to make determinations about members of the public?	N/A
9. 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.	Yes. The information will be retrieved from CCR via the vendor's TIN and DUNS Number.
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.
11. Will this information system provide the capability to identify, locate, and monitor individuals?	STRIPES does not have the capability to identify, monitor, or locate individuals.
12. What kinds of information are collected as a function of the monitoring of individuals?	N/A
13. What controls will be used to prevent unauthorized	N/A

Module III – Systems with Information About Members of the Public

monitoring?	

SIGNATURE PAGE		
	Signature	Date
PIA Approval Signatures	**Original Copy Signed and On File with the DOE Privacy Office**	