



MA-1029

Affects
Members
Of the Public?

X

Department of Energy
Privacy Impact Assessment (PIA)

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.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	July 28, 2010	
Departmental Element & Site	The official list of Departmental Elements can be accessed at www.directives.doe.gov/pdfs/reftools/org-list.pdf . 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.	
New PIA <input type="checkbox"/>	May 26, 2010	
Update <input checked="" type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
iManage Program Manager	Warren Huffer, Director, Office of Corporate Information Systems Office of the Chief Financial Officer U.S. Department of Energy, CF-40	(301) 903-3761 warren.huffer@hq.doe.gov



PRIVACY IMPACT ASSESSMENT: **ORG NAME – SYSTEM NAME**
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MODULE I – PRIVACY NEEDS ASSESSMENT

Project Manager System Owner	20300 Century Boulevard, Germantown, MD 20874 Douglas L. Baptist Director – Information Management Systems Division, Office of Procurement and Assistance Management 1000 Independence Avenue, S.W., Washington, DC 20585	202-287-1658 douglas.baptist@hq.doe.gov
Technical Deputy Project Manager	Matthew Sparks Office of Corporate Information Systems, U.S. Department of Energy, CF-40 20300 Century Boulevard, Germantown, MD 20874	(301) 903-2144 matt.sparks@hq.doe.gov
Local Privacy Act Officer	N/A	N/A
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Phil Knopp Office of Corporate Information Systems, CF- 40 Germantown, U.S. Department of Energy	(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.	



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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**
- ☐ 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
- ☒ Other – Vendor's Tax Identification Number (TIN) and DUNS

No personal information is collected directly from the public. STRIPES collects responses to Requests for Proposal (RFPs), Requests for Quote (RFQs), Requests for Information (RFIs), financial assistance applications, Information for Bid (IFB), Request for Applications and Funding Opportunity Announcements (FOA), and oral quotes, 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 when a vendor is loaded into STRIPES. 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 PII does not exist on the system?

YES

DOE Order 206.1, *Department of Energy Privacy Program*, defines PII as any information collected or maintained by the Department about an individual,



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including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric data, and including any other personal information that is linked or linkable to a specific individual.

If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)

Information is reviewed by DOE officials to verify if PII is contained in the system.

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

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. If a company is awarded a DOE contract, they are then considered a DOE contractor.

4. Is the information about DOE or contractor employees?

YES

☐ Federal Employees
☒ Contractor Employees



MODULE I – PRIVACY NEEDS ASSESSMENT

If the answer to **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 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. 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.

PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

1. AUTHORITY

What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?

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).



MODULE II – PII SYSTEMS & PROJECTS

2. CONSENT

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.

3. CONTRACTS

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.



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4. IMPACT ANALYSIS: How does this project or information system impact privacy?	STRIPES rates a Moderate for Privacy Impact Analysis. The unauthorized disclosure of information could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals. The current implementation of the STRIPES security controls mitigates any impact on privacy.
5. SORNs How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)? 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. ORCA records will be retrieved via the vendor's DUNS number.
6. SORNs Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>? If "Yes," provide name of SORN and location in the <i>Federal Register</i>.	DOE-82 – Grant and Contract Records for Research Projects, Science Education, and Related Activities.
7. SORNs If the information system is being modified, will the SORN(s) require amendment or revision?	NO. Based on current and planned activities the SORN will not require updating.

DATA SOURCES



8. What are the sources of information about individuals in the information system or project?	<p>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.”</p> <p>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.</p> <p>Individuals are exempt from CCR registration.</p> <p>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.</p>
9. Will the information system derive new or meta data about an individual from the information collected?	No
10. 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.
DATA USE	
11. How will the PII be used?	<p>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.</p> <p>With the exception of the TIN, the other CCR information accessed by DOE Federal and contractor employees is available to the public.</p>



12. If the system derives meta data, how will the new or meta data be used? Will the new or meta data be part of an individual's record?	The system does not derive metadata.
13. With what other agencies or entities will an individual's information be shared?	Information regarding individuals is not shared.
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	None.
15. What will be the use of these reports?	N/A
16. Who will have access to these reports?	N/A
Monitoring	
17. 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.
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A
DATA MANAGEMENT & MAINTENANCE	

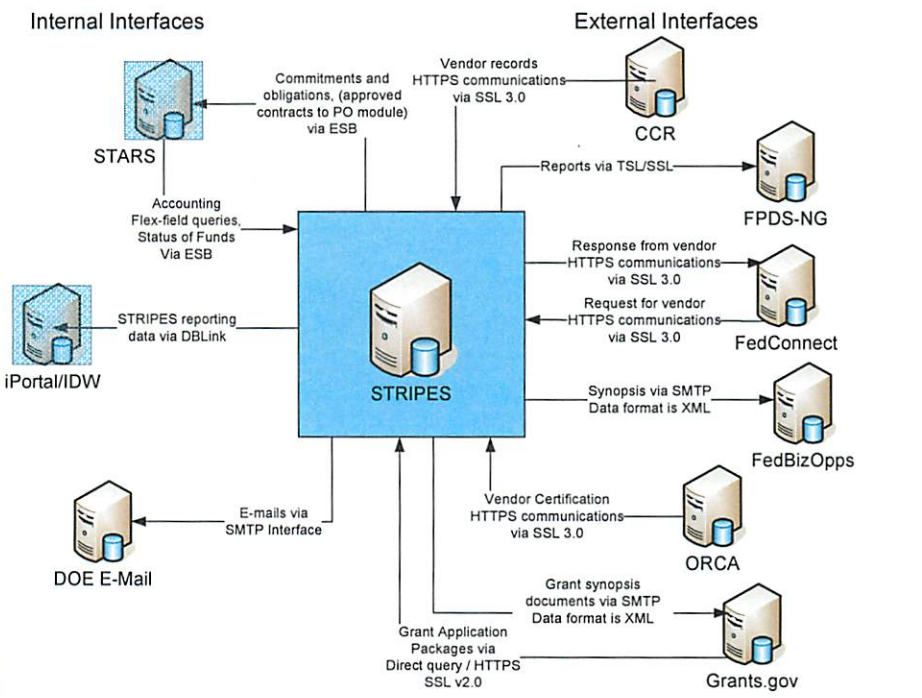


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20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records.	Currency and accuracy of the data is the function of the Central Contractor Registration (CCR).
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	Consistent use of this system across the DOE complex will be maintained by requiring user training, providing users with system operational documentation, and the system enforces consistent use.
Retention & Disposition	
22. 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)
23. 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)
ACCESS, SAFEGUARDS & SECURITY	
24. 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.



<p>25. Who will have access to PII data?</p>	<p>DOE Federal and contractor acquisition personnel have access to the data in the system.</p>
<p>26. How is access to PII data determined?</p>	<p>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.</p>
<p>27. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>The STRIPES application is integrated with several internal DOE systems as well as external Federal systems, as shown in the figure below. STRIPES will invoke interfaces to send or retrieve information with both internal systems, such as STARS, and with external Federal systems. STRIPES will be the controlling entity of all data flow to and from STRIPES.</p>  <p>IDW retrieves data from STRIPES. STRIPES cannot control what data IDW retrieves from STRIPES, but STRIPES retains the ability to prevent IDW from retrieving any data.</p>



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28. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected?

Yes

29. Who is responsible for ensuring the authorized use of personal information?

The System Owner, as identified above.

END OF MODULE II



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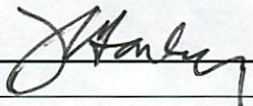

SIGNATURE PAGE

	Signature	Date
iManage Program Manager	<p>Warren Huffer</p> <p>_____ (Print Name)</p> <p> _____ (Signature)</p>	<p>8/3/2010</p> <p>_____</p>
Technical Deputy Project Manager	<p>Matthew Sparks</p> <p>_____ (Print Name)</p> <p> _____ (Signature)</p>	<p>7/29/2010</p> <p>_____</p>
Project Manager System Owner	<p>Douglas Baptist</p> <p>_____ (Print Name)</p> <p> _____ (Signature)</p>	<p>8/10/10</p> <p>_____</p>
Local Privacy Act Officer	<p>N/A</p> <p>_____ (Print Name)</p> <p>_____ (Signature)</p>	<p></p> <p>_____</p>



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Jerry Hanley Chief Privacy Officer		<u>08/12/10</u>
Ingrid Kolb Senior Agency Official for Privacy (SAOP)		<u>8-24-10</u>