



Affects Members Of the Public?	<input checked="" type="checkbox"/>
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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	06/09/09
Departmental Element & Site	Idaho National Laboratory Building Name: IAB
Name of Information System or IT Project	Manchester Software 1099 Reporting
Exhibit Project UID	202021
New PIA <input checked="" type="checkbox"/>	
Update <input type="checkbox"/>	

Name, Title		Contact Information Phone, Email
System Owner	Bryan Larson, Technical Lead, Manchester Software 1099 Reporting	208-526-8685 Bryan.Larson@inl.gov
Local Privacy Act Officer	Dale Claflin Privacy Act Officer	208-526-1199 Dale.Claflin@inl.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Daniel Jones Technical Lead, Cyber Security	208-526-6477 Daniel.Jones@inl.gov
Person Completing this Document	Brandy J. Cooper	208-526-5390 Brandy.Cooper@inl.gov
Purpose of Information System or IT Project	Manchester software is used to create Internal Revenue Service (IRS) Form 1099, and to facilitate electronic reporting requirements as dictated by the IRS.	
Type of Information Collected or Maintained by the System:	<input checked="" type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify	
Has there been any attempt to verify PII does not exist on the system? DOE Order 206.1, <i>Department of Energy Privacy Program</i> , defines PII as any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to	Yes	



MODULE I – PRIVACY NEEDS ASSESSMENT

<p><i>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.</i></p>	
<p>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</p>	<p>Manual validation was provided by the Data Services group. Additionally, when performing the Privacy Impact Assessment information was verified.</p>

Threshold Questions

<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	<p>YES</p>
<p>2. Is the information in identifiable form?</p>	<p>YES</p>
<p>3. Is the information about individual Members of the Public?</p>	<p>YES</p>
<p>4. Is the information about DOE or contractor employees?</p>	<p>YES</p> <p><input type="checkbox"/> Federal Employees</p> <p><input checked="" type="checkbox"/> Contractor Employees</p>

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.



MODULE I – PRIVACY NEEDS ASSESSMENT

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

<p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<p>IRS regulations require the submission of payment amounts for certain vendors. This information must be submitted to the individuals on Form 1099, and electronically to the IRS.</p>
<p>2. CONSENT</p> <p>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)?</p>	<p>Failure of an individual to submit a W-9 will result in backup withholding on every payment, per IRS requirements. The IRS requires that this information, located on form W-9, be provided by the individual, and that the subsequent reporting be submitted. Per IRS regulations, if the information provided by the individual is misused, the requester could be subject to civil and criminal penalties.</p>
<p>3. CONTRACTS</p> <p>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?</p>	<p>NO</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>Any personal information is provided to the INL by the individual. Any subsequent reporting that may result is sent to the individual and to the IRS only. Compromise of the system could result in PII being disclosed to those without a need to know.</p>
<p>5. SORNs</p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>Data can be retrieved by SSN, name, address.</p>
<p>6. SORNs</p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>DOE-05, DOE-18, DOE-19</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>NO</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Form W-9s are completed and submitted by the individual. This form includes the individuals name, social security number, and address. The total amount paid to the individual is provided from Asset Suite, our accounts payable system.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>NO</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Data elements are described in vendor data.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The INL is required to abide by IRS reporting requirements. The IRS requires the collection of Form W-9 and the subsequent reporting of all compensation paid to vendors and non-employee individuals that meet specific criteria. PII will be used to comply with this IRS requirement.</p>
<p>12. If the system derives meta data, how will the new or meta data be used?</p> <p>Will the new or meta data be part of an individual's record?</p>	<p>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>IRS</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>IRS Form 1099, Electronic file for submission to the IRS.</p>
<p>15. What will be the use of these reports?</p>	<p>IRS Form 1099 is mailed to the individual per IRS requirements to detail the payments issued to the individual during the calendar year. IRS will receive an electronic copy for the mandated reporting requirements.</p>
<p>16. Who will have access to these reports?</p>	<p>Individuals in General Accounting assigned to generate Form 1099, the electronic file is sent to the IRS, and the individual receives a Form 1099.</p>



MODULE II – PII SYSTEMS & PROJECTS

Monitoring

<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>NO</p>
<p>18. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>N/A</p>
<p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>N/A</p>

DATA MANAGEMENT & MAINTENANCE

<p>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.</p>	<p>Information is completed and submitted by the individual. Periodic TIN matching is performed to validate the information.</p>
<p>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</p>	<p>N/A</p>

Retention & Disposition

<p>22. What are the retention periods of data in the information system?</p>	<p>Indefinite. We receive an updated software package each year, and the data is then migrated to the new version.</p>
<p>23. What are the procedures for disposition of the data at the end of the retention period?</p>	<p>N/A</p>

ACCESS, SAFEGUARDS & SECURITY



MODULE II – PII SYSTEMS & PROJECTS

24. What controls are in place to protect the data from unauthorized access, modification or use?	The INL has implement controls per the DOE's Program Cyber Security Plan version 1.2 and continues to operate within the guidance of the PCSP. This system is included in the Business Enclave, which is categorized as moderate, and was certified and accredited December 19, 2007.
25. Who will have access to PII data?	Individuals directly associated with the creation of the Form 1099 and subsequent electronic file.
26. How is access to PII data determined?	Access is granted only to those individuals involved in the creation and submission of IRS Form 1099
27. Do other information systems share data or have access to the data in the system? If yes, explain.	NO
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?	N/A
29. Who is responsible for ensuring the authorized use of personal information?	System owner and individuals who are responsible for IRS Form 1099 reporting..

END OF MODULE II

SIGNATURE PAGE

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