

U.S. Nuclear Regulatory Commission

Privacy Impact Assessment

General system/application (system) information (See definitions at end of document)

1. Person completing this form:

Name	Title	Phone #	E-mail	Office
Susan Hopkins	Sr. Policy Analyst	415-6514	sbh	ADM

2. System owner:

Name	Title	Phone #	E-mail	Office
Karen Cudd	IT Coordinator	415-6554	kjc1	ADM

3. Person performing privacy compliance review:

Name	Title	Phone #	E-mail	Office
Sandra Northern 4/26/2004	Privacy Program Officer	415-6879	ssn	OCIO

4. What is the name of this system?

The Automated Acquisition Management System (AAMS)

5. Briefly describe the purpose of this system (support of what agency function)?

The Office of Administration (ADM) is upgrading its current procurement document writing system (PRODOCS) and replacing its procurement data collection and reporting system (CAPS) with a highly-configurable web-based commercial-off-the-shelf (COTS) product offering from Distributed Solutions, Inc.(DSI). The AAMS is a suite of products targeted at the federal procurement professional. It is comprised of several subsystems:

- ProTrac - procurement process
- ProFund – fund tracking and management
- ProDoc – procurement document generation
- Web RegSearch – regulatory reference database for procurement actions

The Division of Contracts (DC) has agency responsibility to develop and implement agency-wide contracting policies and procedures; direct and coordinate contracting, simplified acquisition, grant and financial assistance activities; provide advice and assistance to NRC program officials regarding procurement regulations, and requirements and methods for meeting program objectives consistent with such regulations; provide oversight for regional procurement activities; and develop and administer agency guidance for contracting activities with the Department of Energy laboratories and other government agencies for a wide variety of goods and services on a competitive and non-competitive basis. The upgrade to a web-based environment will provide DC with the means to meet these responsibilities as well as to maintain an efficient electronic interface with the Federal Procurement Data System-Next Generation (FPDS-NG) as well as the Central Contractor Registration (CCR) system which is required as a result of Federal Acquisition Regulation (FAR) mandates.

AAMS will be able to retain contractor name, NRC contract number, and contract award amount that is already stored in CAPS.

6. Does this system contain any personal information (name, social security number, date of birth, home address, etc) about individuals?

Yes No .

If no, stop here and return this form to Louis Numkin, lmn@nrc.gov OCIO.

If yes, please complete remainder of form.

Data in the System

1. What type of information is being maintained in the system (financial, medical, training, personnel, etc)?

These records contain personal information (such as technical qualifications, education, rates of pay, employment history) of contractors and their employees. They also contain evaluations, recommendations, and reports of NRC procurement officials, assessment of contractor performance, invoice payment records, and related information.

2. Source of the information in this system.

- a. **Is data being collected from the subject individual? If yes, what type(s) of data is being collected?** Yes. Records contain personal information (such as technical qualifications, education, rates of pay, employment history) of contractors and their employees.

- b. **Is data on this individual being collected from other NRC files and databases for this system? If yes, identify the files and databases?**

No.

- c. **Is data on this individual being collected from source(s) other than the subject individual and NRC records? If yes, what is the source(s) and what type(s) of data is being collected?**

Yes.

Past contract performance of an offeror is one of the relevant factors that a contracting official of an executive agency should consider in awarding a contract. Past contract performance information may be collected under the government-wide website, Past Performance Information Reporting System (PPIRS). Business information will be collected from the federal-wide Central Contractor Registration database in accordance with Federal Acquisition Regulation requirements.

- d. **How will data collected from source(s) other than the subject individual or NRC records be verified as current, accurate, and complete?**

Past performance data about the contractor collected from the PPIRS website has been verified by both the Government agency supplying the data and the contractor who reviewed and approved the data. All business information received from the Central Contractor Registration database has been entered, verified, and updated by the contractor alone.

3. Are the data elements described in detail and documented? If yes, what is the name of the document?

Yes.

Data elements for collecting past performance information are described in Federal Acquisition Regulation (FAR) Parts 9, 12, 13, 15, 36 and 42. Data elements for collecting business information for contract reporting purposes are described in FAR Part 4.

Attributes of the Data

1. Is the use of the data both relevant and necessary for the purpose for which the system is designed ?

Information in contract records may be used to provide information to the Federal Procurement Data Center, Department of Health and Human Services, Defense Contract Audit Agency, General Accounting Office, and other Federal agencies for audits and reviews. Information in contract records may also be used for information contained in "Categories of Records" above.

2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?

No.

a. How will aggregated data be maintained, filed, utilized?

Not applicable

b. How will aggregated data be validated for relevance and accuracy?

Not applicable

3. If data is consolidated, what controls protect it from unauthorized access/use?

The data will not be consolidated within the system.

4. How will the data be retrieved?

Data will be retrieved via reports and by queries controlled by user access levels.

a. Can it be retrieved by personal identifier? If yes, explain.

Data can be retrieved by contract number, purchase order number; and are cross-referenced to the name of the contractor, vendor, or procurement official.

5. What type(s) of report(s) can be produced from this system?

There will be 10 standard reports available from this system. There will also be adhoc reports available.

a. What are the reports used for?

The reports will be used to manage NRC commercial acquisitions.

b. Who has access to these reports?

Authorized users within the NRC Headquarters and the regional offices.

Maintenance of Administrative Controls

1. What is the retention period of the data in this system?

Records for transactions of more than \$100,000 are destroyed 6 years and 3 months after final payment, in accordance with GRS 3-3.a(1)(a). Transactions of \$100,000 or less are destroyed after 3 years after final payment in accordance with GRS 3-3.a(1)(b).

a. What are the procedures for disposition of the data at the end of the retention period?

Paper records are destroyed through regular trash disposal system, except for confidential business (proprietary) information which is destroyed by shredding. Retention of electronic records in ADAMS will be archived into a historical file within the system.

b. How long will produced reports be maintained?

Most reports will be maintained for six months or less.

c. Where are the reports stored?

The reports are stored in locked file cabinets.

d. Where are the procedures documented?

The procedures are documented in Management Directive 3.53, Records Management.

2. Will this system provide the capability to identify, locate and monitor individuals? If yes, explain.

No.

a. What controls will be used to prevent unauthorized monitoring?

Not applicable.

3. Under which Privacy Act system of records (SOR) notice does this system operate (link to list of SOR available on NRC Internal Home page)? Provide number and name. [If preparer unable to determine, they should call Sandra Northern, 415-6879]

The AAMS operates under NRC-5, Contracts Records Files.

a. If the system is being modified, will the SOR notice require amendment or revision? Explain.

The AAMS system is an upgraded system. The SOR notice will not require amendment or revision.

Access to the Data

1. **Who will have access to the data in the system (users, managers, system administrators, developers, other)?**

Authorized NRC staff (e.g., Contracting Officer, Contract Specialist, Project Officer, Voucher Examiners) will have access to the data as it pertains to their contract management responsibilities.

2. **Are criteria, procedures, controls, and responsibilities regarding access documented?**

This is an upgraded system. The access criteria, procedures, controls and responsibilities are documented by the contractor.

3. **Will users have access to all data in the system or will users access be restricted? Explain.**

Access will be controlled by multiple-level access controls.

4. **What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?**

The data will be password protected and audit trails will be maintained in the new system.

5. **Do other systems share data or have access to data in this system?**

Yes. The mandatory Federal Reporting Database System-Next Generation will receive batch updates from AAMS but not directly interface.

6. **Will other agencies share data or have access to data in this system (Federal, State, Local, other)? Explain.**

No.

7. **Were Privacy Act clauses cited and other regulatory measures addressed in contracts with contractors having access to this system?**

Yes.

Return completed Privacy Act Assessment to Louis Numkin, OCIO, lmn@nrc.gov

DEFINITIONS

Personal Information is information about an identifiable individual that may include but not be limited to:

- race, national or ethnic origin, religion, age, marital or family status
- education, medical, psychiatric, psychological, criminal, financial, or employment history
- any identification number, symbol, or other particular assigned to an individual
- name, address, telephone number, fingerprints, blood type, or DNA

Aggregation of data is the taking of various data elements and then turning them into a composite of all the data to form another type of data such as tables or data arrays, or collecting data into a single database.

Consolidation means combining data from more than one source into one system, application, or process. Existing controls for the individual parts should remain or be strengthened to ensure no inappropriate access by unauthorized individuals. However, since individual pieces of data lose their identity, existing controls may actually be diminished - e.g: a summary census report may not point at the individual respondent but rather at a class of respondents, which makes it less personal.

PIA review included as an attachment.

From: Sandra Northern
To: Susan Hopkins
Date: Mon, Apr 26, 2004 3:35 PM
Subject: Re: PIA for DC's upgraded Contract Writing system

Automated Acquisition Management System (AAMS) Privacy Impact Assessment Review for Privacy Act Compliance

Based on our recent telephone conversation, email, and my review of the attached privacy impact assessment submitted to me on 4/23, I find that the AAMS will be covered by the current system of records NRC-5, "Contracts Records Files," and that no modification to the system notice is required.

The AAMS will replace the two automated systems currently maintained under NRC-5 which are PRODOCS, the contract writing system, and CAPS, the contracts and payment system. No change in the records being collected and no additional/new disclosures of the records.

If you have any questions please feel free to call me.

Sandy Northern
Privacy Program Officer
301-415-6879

>>> Susan Hopkins 04/26/04 01:57PM >>>

The AAMS will not collect any additional records in its 4 modules that what is collected in the current system of records notice, NRC-5.

No other disclosures other than what is listed (e.g., Federal Procurement Data Center) will be made of the information contained in AAMS.

Thanks for your assistance.

>>> Sandra Northern 04/26/04 11:28AM >>>

Here are some questions I need you to answer for me. I need this information to determine if the system notice needs to be modified.

Will the new AAMS collect any **additional** records in its 4 modules than the current system of records notice, NRC-5, covers? I noted that the type of information contained in the system listed in the Privacy Impact Assessment you have prepared appears to have come directly from the system of records notice.

Will any other disclosures (other than the following: to the Federal Procurement Data Center, Department of Health and Human Services, Defense Contract Audit Agency, General Accounting Office, and other Federal agencies for audits and reviews) be made of the information maintained in the AAMS?

>>> Susan Hopkins 04/23/04 10:12AM >>>

Sandy - the OCIO still hasn't given me an answer as to how the PIA for non-CPIC systems gets to you. We want to implement our upgraded system on May 6th. Could you please look at this PIA and tell me if you have any concerns with it.

Background - we're upgrading our current procurement document writing system (PRODOCS) and replacing our internal procurement data collection and reporting system (CAPS) with a web-based COTS product developed for the federal procurement professional.

Thanks for your assistance.

CC: Donnie Grimsley; Louise Lovell; Mary Lynn Scott