

U.S. Nuclear Regulatory Commission

Privacy Impact Assessment

(Designed to collect the information necessary to make relevant determinations regarding applicability of the Privacy Act, the Paperwork Reduction Act information collections requirements, and record management requirements.)

for the

Financial Accounting and Integrated Management Information System

Date prepared by sponsoring office: June 11, 2008

A. GENERAL SYSTEM INFORMATION

1. Provide brief description of the system:

The new Financial Accounting and Integrated Management Information System (FAIMIS) will replace the existing core accounting system, the Federal Financial System (FFS), and will be hosted by the Department of the Interior, National Business Center (NBC) through a cross-service agreement. FAIMIS will be a server based system with web user access that complies with Federal systems standards and security requirements for major financial systems. FAIMIS intends to fulfill the functions currently supported by the Allotment/Allowance Financial Plan System (AAFP), the Capitalized Property System, the Cost Accounting System (CAS), and multiple applications comprising the Fee Billing System (FEES). FAIMIS will provide functionality for budget execution and funds control, general ledger, accounts payable, accounts receivable, travel, fixed assets, internal and external reporting, and cost accounting. FAIMIS will provide a reporting and querying capability directly to end-user's desktops that will facilitate financial analysis of agency programs, activities, and projects.

FAIMIS will be the central repository for all NRC financial transactions and data. Data elements comprising the NRC accounting structure for budget execution and funds control, proprietary accounting, labor reporting, and cost accumulation will be established in the FAIMIS. The agency Budget Formulation System (BFS), Time & Labor (T&L), and e-Travel applications will be integrated with the FAIMIS to facilitate data exchange between the applications. The FPPS payroll application will feed payroll cost data to the FAIMIS through a direct interface. IT applications external to the OCFO may interface with the FAIMIS in order to access agency financial data.

2. What agency function does it support?

The FAIMIS will be the core financial management system of the NRC and will support all financial functions and provide agency compliance with Federal proprietary and

budgetary accounting and financial reporting requirements. The FAIMIS will also perform license fee billing and collection, cost accounting, funds control, and capitalized property.

3. Describe any modules or subsystems, where relevant, and their functions.

The FAIMIS will consist of a number of subsystems/modules designed to perform specific operational and management functions. Integrated components will include:

- Accounts Payable
- Accounts Receivable
- Budget Execution
- Cost Management
- External Reporting
- Fixed Assets
- Internal Reports and Queries
- General Ledger
- General Systems
- Purchasing
- System Security

4. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Fredericks, Carl	CFO/DFM	301-415-6285
Program Manager	Office/Division/Branch	Telephone
Rossi, Anthony	CFO/DFM	301-416-7379
Business Project Manager	Office/Division/Branch	Telephone
Givvines, Mary	CFO/DFM	301-415-7379
Technical Project Manager	Office/Division/Branch	Telephone
Rossi, Anthony	CFO/DFM	301-415-7379
Executive Sponsor	Office/Division/Branch	Telephone
Dyer, James	CFO	301-415-7322

5. Does this Privacy Impact Assessment (PIA) support a proposed new system or a proposed modification to an existing system?

a. New System Modify Existing System Other (Explain)

The FAIMIS is a new system that replaces an existing system to be maintained and operated by a third party Federal Shared Service Provider (SSP), the NBC.

- b. If modifying an existing system, has a PIA been prepared before?

N/A

- (1) If yes, provide the date approved and ADAMS accession number.

N/A

B. INFORMATION COLLECTED AND MAINTAINED

(These questions are intended to define the scope of the information requested as well as the reasons for its collection. Section 1 should be completed only if information is being collected about individuals. Section 2 should be completed for information being collected that is not about individuals.)

1. INFORMATION ABOUT INDIVIDUALS

- a. Does this system collect information about individuals?

Yes

- (1) If yes, what group(s) of individuals (e.g., Federal employees, Federal contractors, licensees, general public) is the information about?

The FAIMIS will hold information about Federal employees, Federal contractors, commercial vendors, invitational travel recipients, and licensees.

- b. What information is being maintained in the system about individuals (describe in detail)?

The FAIMIS will maintain names, taxpayer identification numbers (TIN), Social Security numbers (SSN), addresses, and bank account/routing numbers.

- c. Is the information being collected from the subject individuals?

Yes

- (1) If yes, what information is being collected from the individuals?

Name, TIN, SSN, Address, and Bank Account/Routing Number.

- d. Will the information be collected from 10 or more individuals who are **not** Federal employees?

Yes

(1) If yes, does the information collection have OMB approval?

Yes

(a) If yes, indicate the OMB approval number:

The OMB approval number is 3150-0188.

e. Is the information being collected from internal files, databases, or systems?

Yes

(1) If yes, identify the files/databases/systems and the information being collected.

Information for Federal employees will be collected from the T&L system. Information for invitational travel recipients will be collected from the e-travel system. Licensee information will be collected from an agency application external to the OCFO. Vendor information will be collected extracted from the Federal Central Contractor Registration (CCR) database.

f. Is the information being collected from external sources?

Yes

(1) If yes, what is the source and what type of information is being collected?

Vendors - Billing information, addresses, and TIN.

g. How will this information be verified as current, accurate, and complete?

Vendor information will be refreshed and updated through an interface with the CCR.

h. How will the information be collected (e.g. form, data transfer)?

The FAIMIS will collect this information from the CCR, IRS Form W-9, e-mail, and telephone communication.

i. What legal authority authorizes the collection of this information?

Section 6109 of IRS Tax Code and the Debt Collection Improvement Act authorizes the NRC to collect information on individuals, vendors, and licensees.

j. What is the purpose for collecting this information?

- Issue payments to individuals and contractors for goods and services received.
- Bill and collect nuclear regulatory fees, indemnity fees, civil penalties, and other miscellaneous fees and charges.
- Bill and collect for reimbursable work performed by the NRC.
- The IRS requires 1099 forms sent to vendors that are annually paid \$600 or more. Complete TIN information is required for this process.

2. **INFORMATION NOT ABOUT INDIVIDUALS**

- a. What type of information will be maintained in this system (describe in detail)?

The FAIMIS will maintain budgetary funds control and proprietary accounting information pertinent to the agency and information about accounts payable, accounts receivable, fixed assets, license fee classifications, the budgetary and accounting code structure, project codes, vendors and debtors, organization codes (agency departments), and reimbursable agreements.

- b. What is the source of this information? Will it come from internal agency sources and/or external sources? Explain in detail.

The information is collected from both internal and external sources. Internal sources are financial and procurement documents produced in the course of conducting NRC business and programs. External sources are documents from vendors and licensees conducting business with the NRC. External sources also include funding and authorizing documents from oversight agencies such as the U.S. Treasury and OMB.

- c. What is the purpose for collecting this information?

To comply with Federal laws and regulations for financial and proprietary accounting and control and account for NRC budgetary resources and to facilitate the account payable, account receivable, fixed asset, travel, and financial reporting processes.

C. **USES OF SYSTEM AND INFORMATION**

(These questions will identify the use of the information and the accuracy of the data being used.)

1. Describe all uses made of the information.

The information will be used to account for agency budgetary resources; accomplish proprietary accounting; and manage programs, activities, and projects. To pay invoices for goods and services received, bill and collect fees, manage vendor and licensee data, perform general ledger accounting and financial reporting.

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

Yes

3. Who will ensure the proper use of the information?

The OCFO in close coordination with the Federal SSP will be responsible for overall operations and management of the system. The Team Chief of the OCFO Financial Systems Operations Team (FSOT) will be responsible for maintaining the operational configuration and security controls for the FAIMIS. Each NRC organization will be responsible for managing their budgetary resources entered into the FAIMIS.

4. Are the data elements described in detail and documented?

FAIMIS data elements will be finalized during the configuration of the system and prior to obtaining an Authority to Operate (ATO).

- a. If yes, what is the name of the document that contains this information and where is it located?

Datasets of the final configuration of the data elements will be obtained from the SSP and user guides will be developed prior to obtaining an ATO. The OCFO and the SSP will maintain this information electronically, in hard copy, and on disk.

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

No

- a. If yes, how will aggregated data be maintained, filed, and utilized?

N/A

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

N/A

- c. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

N/A

6. How will the information be *retrieved* from the system (be specific)?

The FAIMIS will provide a reporting/query desktop tool for end-users to access real-time

data directly against the data source. Information will also be retrieved online by viewing the appropriate table/form. The end-user's profile and security configuration will limit his/her access to information.

7. Will this system provide the capability to identify, locate, and monitor (e.g., track, observe) individuals?

No, this system does not provide the capability to monitor, track, or observe individuals.

- a. If yes, explain.

- (1) What controls will be used to prevent unauthorized monitoring?

8. Describe the report(s) that will be produced from this system.

The FAIMIS will provide reports and desktop query capability to track and report financial, budgetary, and proprietary information concerning the programs and business conducted by the NRC. The FAIMIS will also provide a tool to allow authorized users to develop reports and export data as needed to conduct business.

- a. What are the reports used for?

Reports and data queries will be needed to execute and manage the programs and business of the NRC. They will also be used to comply with Federal laws and regulations including external reporting requirements.

- b. Who has access to these reports?

Users from each organization will have access to view the status of their budgetary resources, programs, activities, and projects. Access restrictions will be based on predefined user roles assigned by FSOT based on position, duties, and information needs. Access will be approved by the user's supervisor and the FSOT Team Chief. The FAIMIS reporting/query tool will allow users to develop and run their own reports and queries limited by their original access.

D. RECORDS RETENTION AND DISPOSAL

(These questions are intended to establish whether the information contained in this system has been scheduled, or if a determination has been made that a general record schedule can be applied to the information contained in this system. Reference NUREG-0910, "NRC Comprehensive Records Disposition Schedule.")

1. Has a retention schedule for this system (either under the General Records Schedule or NRC-specific) been approved by the National Archives and Records Administration? If yes, list the schedule number and approved

disposition.

No.

If you answered no to this question, complete NRC Form 637, NRC Electronic Information System Records Scheduling Survey, and submit it with this PIA.

E. ACCESS TO DATA

1. INTERNAL ACCESS

- a. What organizations (offices) will have access to the information in the system?

All NRC offices will have staff assigned as FAIMIS users.

- (1) For what purpose?

the These offices will have access to enter financial transactions in the system and query the system to conduct business, manage their budgetary resources, and meet proprietary accounting needs.

- (2) Will access be limited?

Yes, user accounts will be established based on transaction processing and information access needs. User profiles and access will be approved by the immediate supervisor and the FSOT Team Chief.

- b. Will other systems share or have access to information in the system?

Yes

- c. How will information be transmitted or disclosed?

The FAIMIS will be the central repository for agency financial information and offices will be required to access the FAIMIS directly to retrieve this data.

- d. What controls will prevent the misuse (e.g., unauthorized browsing) of information by those having access?

End-users will have established login credentials to access information. These login credentials will restrict the user to only having access to information and data for which they have been previously authorized.

Access to vendor and employee personally identifiable information (PII) will be restricted to a limited number of users responsible for system

administration functions. Vendor information will be used for entering transactions in the FAIMIS. However, data fields with PII information will be restricted from view when users enter vendor codes in the FAIMIS for transaction processing and querying. User access will be restricted based on predefined profiles that will be assigned based on the user's duties and information needs. Security controls (password verification) will be in place to eliminate unauthorized access.

- e. Are criteria, procedures, controls, and responsibilities regarding access documented?

Yes, the FAIMIS will have documented procedures and controls regarding access. This information will be developed during the configuration of the new system.

(1) If yes, where?

The OCFO FSOT will maintain the following types of documentation regarding criteria, procedures, controls, and responsibilities for information access:

- FAIMIS Registration Form
- FAIMIS Security Profile Descriptions
- FAIMIS Rules of Behavior
- FSOT Desktop Procedures User IDs
- FAIMIS Login Procedures

2. **EXTERNAL ACCESS**

- a. Will external agencies/organizations/public share or have access to the information in this system?

No

(1) If yes, who.

N/A

- b. What information will be shared/disclosed and for what purpose?

N/A

- c. How will this information be transmitted or disclosed?

N/A

F. **TECHNICAL ACCESS AND SECURITY**

1. Describe security controls used to limit access to the system (e.g., passwords).

Explain.

The following security controls are in place for the existing core accounting system and followed by the SSP and FSOT personnel. The new FAIMIS will have these same controls and any additional controls developed during the implementation phase:

- Application level access forms will be completed (signed) and sent to the SSP.
- The establishment of a new user account will be approved by FSOT upon receipt of a supervisor approved application form.
- The end-user will be required to have a security clearance.
- The end-user will be required to sign the Rules of Behavior.
- User access levels will be determined based on the user's organization profile.
- The system will be secured with the appropriate password protection.

2. Will the system be accessed or operated at more than one location (site)?

Yes, the system will be accessed from headquarters offices and from four regional offices.

a. If yes, how will consistent use be maintained at all sites?

Through the use of the agency's LAN/WAN and a standard dedicated telecommunications line.

3. Which user groups (e.g., system administrators, project manager, etc.) have access to the system?

Pre-defined user groups will be established for the FAIMIS and all groups will have access to the system.

4. Will a record of their access to the system be captured?

Yes

a. If yes, what will be collected?

Audit logs and system access records are part of Federal Financial Management System requirements. These requirements have been incorporated into the FAIMIS System Requirements Specification (SRS) document as part of the FAIMIS business case. The new FAIMIS solution will capture a record of the User ID with a time and date stamp, table/form or transaction accessed, and action taken. The FAIMIS will also maintain a record of any batch, report, or interface job run.

5. Will contractors have access to the system?

Yes

a. If yes, for what purpose?

Various purposes and we will ensure that the following Federal Acquisition Regulation (FAR) clauses are referenced in all contracts/agreements/purchase orders where a contractor has access to a Privacy Act system of records to ensure that the wording of the agency contracts/agreements/purchase order make the provisions of the Privacy Act binding on the contractor and his or her employees:

- 52.224-1 Privacy Act Notification.
- 52.224-2 Privacy Act.

Some examples of contractor access: perform data entry regarding payment vouchers and other invoices scheduled and paid; audit financial statements (limited inquiry only); assist with systems projects, etc.

6. What auditing measures and technical safeguards are in place to prevent misuse of data?

The following security controls exist for the current core accounting system and are followed by the SSP and FSOT personnel. At a minimum, the new FAIMIS will have these same controls as well as any additional controls developed during the system configuration:

- Application-level access forms will be completed (signed) and sent to the SSP.
- User access levels will be determined based on the user's organization profile.
- Predefined user profiles will be established to provide assurance of separation of duties.
- System will be secured with password protection.
- Only users with appropriate access levels will be able to edit reference data (establishing budgetary and accounting codes and job codes).
- Establishing a new budgetary and accounting code will require approval from the OCFO/DPBA.
- Daily, monthly, and end-of-cycle Q/A checks will be developed and put in place.
- A process for system change requests will be in place to maintain documentation of changes.

7. Are the data secured in accordance with FISMA requirements?

The SSP will perform a Certification and Accreditation (C&A) of the system and the NRC will request an ATO for the new FAIMIS.

a. If yes, when was Certification and Accreditation last completed?

The C&A will be performed after configuring and testing the system and an ATO will be obtained prior to the operation of the FAIMIS.

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL
(For Use by OIS/IRSD/RFPSB Staff)

System Name: Financial Accounting and Integrated Management Information System (FAIMIS)

Submitting Office: Office of the Chief Financial Officer

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable. See comments.

Comments:

FAIMIS, as the replacement for the NRC's core accounting system (FFS), will maintain records subject to the Privacy Act from the following systems of records: NRC-20, "Official Travel Records," NRC-21, "Payroll Accounting Records," and NRC-32, "OCFO Financial Transactions and Debt Collection Management Records."

This system will contain personally identifiable information.

Reviewer's Name	Title	Date
Sandra S. Northern	Privacy Program Officer	June 24, 2008

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance Number: 3150-0188

Comments:

The information collected from the public for this system has been approved by OMB and assigned the above stated clearance number.

Reviewer's Name	Title	Date
Gregory Trussell	Information Collections Team Leader	June 23, 2008

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

- No record schedule required.
- Additional information is needed to complete assessment.
- Needs to be scheduled.
- Existing records retention and disposition schedule covers the system - no modifications needed.
- Records retention and disposition schedule must be modified to reflect the following:

Comments:

The Core Financial System (CFS/FAIMIS) has not been scheduled and the Department of Interior/National Business Center (DOI/NBC) has not submitted a schedule for it to the National Archives. NRC needs to schedule CFS records retained by NRC. These records probably can be given a short-term retention as DOI/NBC maintains the master records in FAIMIS.

Since FAIMIS is not scheduled, NRC may not apply the GRS 20 items to these records which require that the relevant database (FAIMIS) be scheduled (e.g., GRS 20, item 2 *inputs*). However, NRC may apply the GRS 20 items to FAIMIS records which don't require that the database is scheduled.

Reviewer's Name	Title	Date
Tracy Clark	Records Management Analyst	6/30/2008

D. BRANCH CHIEF REVIEW AND CONCURRENCE

- This IT system **does not** collect, maintain, or disseminate information in identifiable form from or about members of the public.
- This IT system **does** collect, maintain, or disseminate information in identifiable form from or about members of the public.

I concur in the Privacy Act, Information Collections, and Records Management reviews:

/RA/ (Margaret A. Janney for) _____ Date: 07/01/2008
Russell A. Nichols, Chief
Records and FOIA/Privacy Services Branch
Information and Records Services Branch
Offices of Information Services

**TRANSMITTAL OF PRIVACY IMPACT ASSESSMENT/
PRIVACY IMPACT ASSESSMENT REVIEW RESULTS**

TO: James Dyer, Chief Financial Officer	
Name of System: Financial Accounting and Integrated Management Information System	
Date RFPSB received PIA for review: June 16, 2008	Date RFPSB completed PIA review: July 1, 2008
<p>Noted Issues:</p> <ul style="list-style-type: none"> • FAIMIS will maintain records subject to the Privacy Act. • FAIMIS will contain personally identifiable information. • No information collection issues. • FAIMIS does not have an approved records disposition schedule. 	
Russell A. Nichols, Chief Records and FOIA/Privacy Services Branch Information and Records Services Division Office of Information Services	Signature/Date: /RA/ 07/01/2008 (Margaret A. Janney for)
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>James C. Corbett, Director Business Process Improvement and Applications Division Office of Information Services</i></p> <p><i>Paul Ricketts Senior IT Security Officer (SITSO) FISMA Compliance and Oversight Team Computer Security Office</i></p>	