

U.S. Nuclear Regulatory Commission

Privacy Impact Assessment

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

for the

Automated Standard Application for Payment (ASAP) System

Date prepared: May 15, 2008

A. GENERAL SYSTEM INFORMATION

1. Provide brief description of the system:

ASAP is an all-electronic payment and information system developed jointly by the U.S. Treasury's Financial Management Service (FMS) and the Federal Reserve Bank of Richmond. The latter, in its capacity as Treasury's fiscal agent, operates the system. ASAP is a system through which grantee organizations receiving federal funds can draw from accounts pre-authorized by Federal agencies. ASAP is also being used to make timely payments to financial agents that are performing financial services for FMS and other federal agencies.

2. What agency function does it support?

Payments to Vendors and Grantees

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

None

4. Points of Contact:

| Project Manager | Office/Division/Branch | Telephone |
|---------------------------|-------------------------------------|--------------|
| Emmanuel (Mike) Atsalinos | Office of Human Resources/HRTD/PDPB | 301-492-2288 |

| Business Project Manager | Office/Division/Branch | Telephone |
|----------------------------------|---|------------------|
| Gordon S. Peterson, Jr. | Office of the Chief Financial Officer/DFS | 301-415-7348 |
| Technical Project Manager | Office/Division/Branch | Telephone |
| Emmanuel (Mike) Atsalinos | Office of Human Resources | 301-492-2288 |
| Executive Sponsor | Office/Division/Branch | Telephone |
| James Dyer | Office of the Chief Financial Officer | 301-415-1270 |

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)

ASAP is an existing Treasury system, that NRC will begin using in the summer of 2008.

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

The system owner, Financial Management Service which is a bureau of the U.S. Treasury, prepared a PIA which can be accessed at http://www.fms.treas.gov/pia/ASAP_pia.pdf.

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

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 maintain 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?

ASAP contains information about members of the public (Grantees, vendors, and students receiving educational grants).

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

Information consists of an individual's name, address, e-mail address, telephone number, bank routing number, bank account number.

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

Yes

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

Information needed to make payments, which includes name, address, e-mail address, telephone number, bank routing number, bank account 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:

OMB Approval No.: 0960-0564

- 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.

NRC's financial system, FFS, VEND and VNAM tables contains some of the information needed to make the payments, but the grantees may provide a different bank account for these payments when they enter their data into ASAP.

- f. Is the information being collected from an external source(s)?

Yes

- g. If yes, what are the sources and what type of information is being collected?

Grantees complete forms to get access to ASAP and receive payments. The information collected includes name, address, e-mail address, telephone number, bank routing number, and bank account number.

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

Internal control procedures and audits of the data help ensure accuracy. ASAP has required fields with edits to ensure completeness of data to the minimum standards specified in requirements documents. ASAP.gov users are provided a means to keep their information current through the application on-line screens, i.e. Modify My Information. It is the sole responsibility of the individual user to maintain his own information, and it is the responsibility of the Authorizing Official to keep the list of users and roles for their organization up to date.

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

Data will be entered into the ASAP system and then either transferred or entered from forms into the agency financial system, FFS.

- j. What legal authority authorizes the collection of this information?

The Energy Policy Act of 2005 authorizes NRC to award these grants.

By statute, Treasury has the authority to disbursement public funds for executive branch agencies. 31 USC 3321. Also, Treasury disbursing officials may only disburse funds in accordance with a payment certification voucher received from a paying agency. 31 USC 3325. ASAP is a disbursement program, which is authorized under these two statutes.

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

ASAP is an Internet payment mechanism that will assist NRC in disbursing monies to grantees.

2. INFORMATION NOT ABOUT INDIVIDUALS

- a. What type of information will be maintained in this system (describe in detail)?
Name, address, email address, telephone number, bank routing number, bank account number, customer account number, award number.
- b. What is the source of this information? Will it come from internal agency sources and/or external sources? Explain in detail.

The data will come from forms completed by participants (external) and also data entered into the ASAP or FFS systems by participants or agency staff (internal).

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

The purpose is to make payments to NRC grantees.

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 make grant payments under the Energy Policy Act of 2005. The system will make payments to grantees and track account balances.

- 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?

Assigned staff from the following offices will ensure the proper use of NRC information:

Office of the Chief Financial Officer (OCFO)

Office of Human Resources (OHR)

Office of Small Business and Civil Rights (SBCR)

Office of Nuclear Regulatory Research (RES)

Office of Administration (ADM), Contracts/Grants staff.

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

Yes

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

The data elements are described in detail in the US Treasury/FMS requirements documents for each module of the application.

- 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?
- b. How will aggregated data be validated for relevance and accuracy?
- c. If data are consolidated, what *controls* protect it from unauthorized access, use, or modification?

ASAP implements and maintains significant and comprehensive security features to ensure that risks, threats and vulnerabilities are minimized.

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

Data can be retrieved by accessing the ASAP website with a unique ID and password. An authorized grantee user can view their account or run reports showing their account activity. An agency user will also enter the system using a unique ID and password and in some cases a token. The agency staff can perform account maintenance, run reports on individual participants or the entire project, review payment requests, approve and certify payments.

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

No

- a. If yes, explain.

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

N/A

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

Accounting, Grant, and account balance reports.

- a. What are the reports used for?

The reports are used by the agency/office awarding the grants for tracking purposes, to perform accounting functions related to accounts payable and preparing the agency financial statements. Grantees are able to run reports to show the current status of their account. They would see payments requested and paid, and their current account balance.

- b. Who has access to these reports?

NRC staff with a need to know from OCFO, OHR, SBCR, RES, and ADM offices have access to system reports. Grantees have access to reports regarding their account and account transactions and balances.

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 been approved by the National Archives and Records Administration (NARA)?

No. This is operated by the U.S. Treasury and has no approved retention schedule.

- a. If yes, list the disposition schedule.

2. Is there a General Records Schedule (GRS) that applies to information in this system?

No. ASAP has not been scheduled and Treasury/FMS has not submitted a schedule for it. NRC needs to schedule the ASAP records retained by NRC. NRC's retained ASAP records can probably be given a short-term retention as Treasury/FMS and their representatives maintain the master record in ASAP.

Since ASAP is not scheduled, NRC may not apply the GRS 20 items to its ASAP records which require that the relevant database (ASAP) be scheduled (e.g., GRS 20, item 2, "inputs"). However, NRC may apply the GRS 20 items to its ASAP records which don't require that the relevant database (ASAP) be scheduled (such as GRS 20, item 16, ad hoc printouts).

- d. If yes, list the disposition schedule.

3. If you answered no to questions 1 and 2, 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?

NRC offices that will have access to information in ASAP include OCFO, OHR, SBCR, RES, and ADM. Also, the US Department of the Interior's National Business Center (DOI/NBC) has access to agency data on behalf of the NRC through an Interagency Agreement.

- (1) For what purpose?

Accounts payable, monitoring payments, system maintenance and support, awarding grants, monitoring grants, financial reporting.

- (2) Will access be limited?

Yes, user access will be restricted to their own data once being identified by user name and password. The user will also be restricted through least privileges by role based access.

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

Yes, some of NRC's information will also appear in the NRC's Federal Financial System (FFS).

- c. How will information be transmitted or disclosed?

File transfer from ASAP to FFS or by data entry from forms or reports.

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

Unique ID and passwords, encrypted file transmissions, hard tokens for certifying officers.

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

(1) If yes, where?

Yes, at the US Treasury/FMS and the Federal Reserve Bank of Richmond.

2. **EXTERNAL ACCESS**

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

Yes

(1) If yes, who.

Yes, other Federal agencies interface with ASAP to provide detailed payment data. Other systems interface with ASAP for the purpose of making payments. For disbursements, only the necessary information to create an electronic payment is sent to the Automated Clearing House (ACH) system. Other interfaces are for Federal agency accounting and do not involve individual data.

Federal agencies that use ASAP to make payments to the public only have access to their Recipient's data. All other non-Federal agency users only have access to their own data.

NRC information can be accessed by the US Treasury/FMS, US Department of the Interior's National Business Center, and organizations or individuals receiving grants.

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

Agency information will be disclosed for the purpose of making vendor or grantee payments.

c. How will this information be transmitted or disclosed?

Data will be transmitted using paper forms which may be faxed or mailed or by electronic file transfer.

F. **TECHNICAL ACCESS AND SECURITY**

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

Unique IDs and passwords, hard tokens for certifying officers, and agency assigned account numbers. Access to data by user is determined by the roles requested when access to the system is granted.

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

Yes

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

Unique IDs and passwords will be used for access to a single secured web site.

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

Payment recipients, project managers, system administrators, developers, and contractors 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?

ID, date & time of transaction, transactions.

5. Will contractors have access to the system?

Yes

- a. If yes, for what purpose?

Maintenance and support, and accounting functions.

- Ensure that the following Federal Acquisition Regulation (FAR) clauses are referenced in all contracts/agreements/purchase order 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.

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

Reports, separation of duties, internal control policies, IDs, passwords, tokens, and audits.

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

Yes

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

May 31, 2007

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

System Name: Automated Standard Application for Payment (ASAP) System

Submitting Office: Office of the Chief Financial Officer (OCFO)

A. PRIVACY ACT APPLICABILITY REVIEW

Privacy Act is not applicable.

Privacy Act is applicable.

Comments:

The information NRC collects, uses, and disseminates about individuals through ASAP is subject to the Privacy Act and maintained as part of NRC's Privacy Act system of records NRC-32, "Office of the Chief Financial Officer Financial Transactions and Debt Collection Management Records."

The U.S. Department of Treasury/Financial Management Service operates ASAP under their system of records Treasury/FMS.016, "Payment Records for Other Than Regular Recurring Benefit Payments."

ASAP contains personally identifiable information about members of the public.

| Reviewer's Name | Title | Date |
|--------------------|-------------------------|--------------|
| Sandra S. Northern | Privacy Program Officer | June 6, 2008 |

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

Currently has OMB Clearance. Clearance No.0960-0564

Comments:

The information NRC collects and uses through ASAP is subject to the Paperwork Reduction Act.

The U.S. Department of Treasury/Financial Management Service received OMB approval to collect this information under OMB Control No. 0960-0564.

| Reviewer's Name | Title | Date |
|------------------|-------------------------------------|--------------|
| Gregory Trussell | Information Collections Team Leader | June 9, 2008 |

C. RECORDS RETENTION AND DISPOSITION 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 US Treasury, Financial Management Service (FMS) system, Automated Standard Application for Payment (ASAP), has not been scheduled, and FMS has not submitted a schedule for it. NRC needs to schedule the ASAP records retained by NRC. NRC's retained ASAP records can probably be given a short-term retention as Treasury/FMS and their representatives maintain the master record in ASAP.

Since ASAP is not scheduled, NRC may not apply the GRS 20 items to its ASAP records which require that the relevant database (ASAP) be scheduled (e.g., GRS 20, item 2, "inputs"). However, NRC may apply the GRS 20 items to its ASAP records which don't require that the relevant database (ASAP) be scheduled (such as GRS 20, item 16, ad hoc printouts).

| Reviewer's Name | Title | Date |
|-----------------|----------------------------|----------|
| Tracy L. Clark | Records Management Analyst | 06/12/08 |

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, Chief
Records and FOIA/Privacy Services Branch
Information and Records Services Division
Office of Information Services

Date: 06/17/2008

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

| | |
|---|--|
| TO: James E. Dyer, Chief Financial Officer | |
| Name of System: Automated Standard Application for Payment (ASAP) System | |
| Date RFPSB received PIA for review: May 28, 2008 | Date RFPSB completed PIA review: June 17, 2008 |
| <p>Noted Issues:</p> <p>The information NRC collects, uses, and disseminates about individuals through ASAP is subject to the Privacy Act and maintained as part of NRC's Privacy Act system of records NRC-32, "Office of the Chief Financial Officer Financial Transactions and Debt Collection Management Records."</p> <p>The U.S. Department of Treasury/Financial Management Service operates ASAP under their system of records Treasury/FMS.016, "Payment Records for Other Than Regular Recurring Benefit Payments.</p> <p>ASAP contains personally identifiable information about members of the public.</p> <p>The U.S. Department of Treasury/Financial Management Service received OMB approval to collect this information under OMB Control No. 0960-0564.</p> <p>ASAP doesn't have an approved records retention and disposition schedule. See reviewer's comments for additional information.</p> | |
| Margaret A. Janney, Chief Records and FOIA/Privacy Services Branch Office of Information Services | Signature/Date: /RA/ 06/17/2008 |
| <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> | |