ADAMS # ML12144A106

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
Financial Accounting and Integrated
Management Information System (FAIMIS)

Date: April 6, 2012

A.   GENERAL SYSTEM INFORMATION

1.   Provide brief description of the system:

The Financial Accounting and Integrated Management Information System (FAIMIS) is a multi-tier, distributed, financial management system supporting dynamic interoperability with other federal systems and providing both financial planning capabilities and the means to record financial transactions. FAIMIS is based upon the CGI Momentum™ 6.4.1 Enterprise Resource Planning (ERP) COTS suite. FAIMIS records purchasing, accounts receivable, accounts payable, disbursements, and other budget activities that are integrated so the transactions, when processed, can update budgets, financial plans, and the general ledger. FAIMIS also offers the functions needed to consolidate financial reports and controls.

Using FAIMIS, NRC staff is able to:
- Track and manage the budget
- Compute and track performance data
- Distribute project costs to appropriate offices
- Provide user-defined queries
- Perform on-line analytical processing to enhance decision processing
- Program spending alerts for key budget items
- Provide real-time and ad hoc reporting capabilities
- Bill and collect NRC License Fee Billing costs/fees
- Capitalize property

2.   What agency function does it support?

FAIMIS is the NRC core financial management system supporting all financial functions and provides agency compliance with Federal proprietary and budgetary accounting and financial reporting requirements. FAIMIS also

performs license fee billing and collection, cost accounting, funds control, and capitalized property.

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

The modules comprising FAIMIS system and their purpose are described below:

- **Accounts Payable**: Tracks all information needed to properly record the expenditure of agency funds.
- **Accounts Receivable**: Records, monitors, and controls all activities in the client's billing and collection process.
- **Automated Disbursements**: Allows the client to disburse funds through the United States Treasury.
- **Budget Execution**: Automates the budget execution process by recording numerous budgetary control levels and validates budgetary financial activity.
- **Cost Allocation**: Provides the capability to distribute costs or revenues for accounting or reporting purposes based on client defined criteria.
- **General Ledger**: Provides all the necessary financial postings for all transactions across all subsystems, and provides a complete audit trail of transactions processed in FAIMIS.
- **General System**: Contains reference data and maintenance tables that form the backbone of FAIMIS.
- **Planning**: Allows users to track, control, analyze, and forecast spending across boundaries normally imposed by the budget structure.
- **Project Cost Accounting**: Allows the client to track project costs incurred, record reimbursable agreements, and distribute project costs to the agreements which are funding the projects, bill customers based upon terms of agreement, and track billing and collection activity against agreements and projects.
- **Purchasing**: Supports the procurement process by tracking a purchase's financial and descriptive information from pre-commitment to funds to a vendor invoice.
- **Fixed Assets**: Allows the client to track capitalized and accountable property from acquisition to disposal, including asset depreciation.
- **Travel Accounting**: Allows the client to track and account for travel orders, advances, and vouchers

4. 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.

5. What is the purpose for collecting this information?

- To comply with Federal laws and regulations for financial and proprietary accounting and control, account for NRC budgetary resources, and to facilitate the account payable, account receivable, fixed asset, travel, and financial reporting processes.
- Issue payments to individuals and contractors for goods and services received, travel, and payroll.
- 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.
- Office of Personnel Management retirement and personnel requirements.

6. Points of Contact

Project Manager	Office/Division/Branch	Telephone
Michelle Curtis	OCFO/DOC/FSB	301-415-7607
Business Project Manager	**Office/Division/Branch**	**Telephone**
Victor Kochuba	OCFO/DOC/FSB	301-415-6270
Technical Project Manager	**Office/Division/Branch**	**Telephone**
Jennifer Castello	OCFO/DOC/FSB	301-415-0693
Executive Sponsor	**Office/Division/Branch**	**Telephone**
Reginald Mitchell	OCFO	301-415-7379

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

a. ___ New System ___X_ Modify Existing System ___ Other (Explain)

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

Yes

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

Date: May 19, 2009, **ADAMS** # ML091520069

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?

   Individuals include Federal employees, Federal contractors, commercial vendors, invitational travel recipients, and licensees

   (2) IF NO, SKIP TO QUESTION B.2.

   b. What information is being maintained in the system about individuals (be specific)?

   FAIMIS maintains 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 existing NRC files, databases, or systems?

Yes

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

Information for employees is collected from the Time and Labor Modification system (TLM). Information for invitational travel recipients is collected from the e-Travel system. Licensee information is collected from the License Tracking System (LTS), General License Tracking System (GLTS), and Reactor Program System (RPS). Information such as vendor codes for employee venders is also collected via RPS.

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

Yes

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

Vendor information (billing information, addresses, and TIN) is collected from the federal Central Contractor Registration (CCR) database.

g. How will this information not being collected directly from the individuals be verified as current, accurate, and complete?

The information from interfacing systems is validated by the source system. Vendor information is refreshed and updated through an interface with the CCR, and notification from vendors.

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

For interfacing systems, the information is collected by forms, file transfer, and electronic data interchange. FAIMIS collects this information from the interfacing systems, CCR, IRS Form W-9, e-mail, and telephone communication.

2. **INFORMATION NOT ABOUT INDIVIDUALS**

a. Will information not about individuals be maintained in the system?
Yes

(1) If yes, identify the type of information (be specific).

FAIMIS maintains 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, as well as the Budget Formulation System (BFS). External sources include documents from vendors and licensees conducting business with the NRC, funding and authorizing documents from oversight agencies such as the U.S.Treasury and the Office of Management and Budget (OMB), and RPS.

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 is used to account for agency budgetary resources; accomplish proprietary accounting; and manage fixed assets, 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 Shared Service Provider, CGI, is responsible for overall operations and management of the system. Operational configuration and security controls for FAIMIS are set to limit access to information based upon the "need to know" and "least access" concepts.

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

Yes, FAIMIS data elements were documented and are included in the data dictionary, System Security Plan (SSP), and training materials, which were developed during the development and configuration of the system.

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

The data dictionary based upon the final configuration of the data elements is located in the SSP and user guides that were developed prior to implementation. The OCFO will maintain this information electronically, in hard copy, and copies of the documentation will be put into ADAMS.

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?

6. How will the information be *retrieved* from the system (be specific)? Will data be retrieved by an individual's name or personal identifier?

Yes, FAIMIS provides a reporting/query desktop tool for end-users to access real-time data directly against the data source. Information is also retrieved online by viewing the appropriate table/form. The end-user's profile and security configuration limit user access to information.

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?

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

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

A list of Business Analytics report on SharePoint
http://portal.nrc.gov/OCM/ocfo/ocfo_admin/faimis/support/MRL/Forms/Production%20Reports%20By%20Name.aspx

FAIMIS only allows a person to see reports they have security to run.

The standard reports are available in FAIMIS by navigating to:

FAIMIS > Utilities > Reports > Run Reports

a.   What are the reports used for?

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

b.   Who has access to these reports?

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

D.   ACCESS TO DATA

1.   What organizations (offices) will have access to the data in the system?

All NRC offices have staff assigned as FAIMIS users.

(1)   For what purpose?

These offices 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 are established based on transaction processing and information access needs. User profiles and access are approved by the user's immediate supervisor and the FAIMIS System Administrator.

2.   Will other NRC systems share or have access to data in the system?

Yes

(1)   If yes, identify the system(s)

Information for employees is collected from the Time and Labor Modification system (TLM). Information for invitational travel recipients is collected from the e-Travel system. Licensee information is collected from the License Tracking System (LTS), General License Tracking System (GLTS), and Reactor Program System (RPS).

Vendor information (billing information, addresses, and TIN) is collected from the Federal Central Contractor Registration (CCR) database.

    (2)   How will data be transmitted or disclosed?

The data is transmitted through electronic interfaces.

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

Yes

    (1)   If yes, who?

Payments users from the National Business Center will have secure access to FAIMIS for the purpose of managing payment activities. Only approved and explicitly authorized NBC users will have access to FAIMIS, via a secure VPN and FAIMIS login credentials.

    (2)   Will access be limited?

Yes, only to NRB users via a secure VPN and FAIMIS login credentials who have been granted access.

    (3)   What data will be accessible and for what purpose/use?

Data related to payment activities

    (4)   How will the data be transmitted or disclosed?

Only approved and explicitly authorized NBC users will have access to FAIMIS, via a secure VPN and FAIMIS login credentials

E.   RECORDS RETENTION AND DISPOSAL

The National Archives and Records Administration (NARA), in collaboration with federal agencies, approves whether records are temporary (eligible at some point for destruction/deletion because they no longer have business value) or permanent (eligible at some point to be transferred to the National Archives because of historical or evidential significance). These determinations are made through records retention schedules and are required under 36 CFR 1234.10. The following questions are intended to determine whether the records in the system have an approved records retention schedule or if one will be needed.

1.   Can you map this system to an applicable retention schedule in NUREG-0910, or the General Records Schedules at http://www.archives.gov/records-mgmt/grs?

Yes, N1-431-10-1

a. If yes, please cite the schedule number, approved disposition, and describe how this is accomplished. For example, will the records or a composite thereof be deleted once they reach their approved retention or exported to a file for transfer based on their approved disposition?

National Archives and Records Administration (NARA) approved retention, N1-431-10-1. Disposition: Temporary, Cut off at the fiscal year and transfer to inactive storage within FAIMIS data storage. Destroy/delete 10 years after cutoff.

b. If the answer to question E.1 is yes, skip to F.1. If the response is no, complete question E.2 through question E.7.

2. If the records <u>cannot</u> be mapped to an approved records retention schedule, how long do you need the records? Please explain.

3. Would these records be of value to another organization or entity at some point in time? Please explain.

4. How are actions taken on the records? For example, is new data added or updated by replacing older data on a daily, weekly, or monthly basis?

5. What is the event or action that will serve as the trigger for updating, deleting, removing, or replacing information in the system? For example, does the information reside in the system for three years after it is created and then is it deleted?

6. Is any part of the record an output, such as a report, or other data placed in ADAMS or stored in any other location, such as a shared drive or MS SharePoint?

7. Does this system allow for the deletion or removal of records no longer needed and how will that be accomplished?

F. TECHNICAL ACCESS AND SECURITY

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

FAIMIS has the following controls in place for limiting system access:
- Application level access forms are completed (signed) and sent to the OCFO.
- The establishment of a new user account is approved by FSB upon receipt of a supervisor approved application form.
- The end-user is required to have a security clearance.
- The end-user is required to sign the Rules of Behavior.
- User access levels are determined based on the user's organization profile.
- The system is secured with the appropriate password protection.

2.   What controls will prevent the misuse (e.g., unauthorized browsing) of system data by those having access?

FAIMIS has the following controls in place for limiting system access:

- Application level access forms are completed (signed) and sent to the OCFO.
- User access levels are determined based on the user's organization profile.
- Predefined user profiles are established to provide assurance of separation of duties.
- System is secured with password protection.
- Only users with appropriate access levels are able to edit reference data (establishing budgetary and accounting codes and job codes).
- Establishing a new budgetary and accounting code requires approval from the OCFO/DPBA.
- Daily, monthly, and end-of-cycle Q/A checks have been developed and put in place.
- A process for system change requests is in place to maintain documentation of changes.
- Only a limited subset of users (as defined by their FAIMIS role) has access to sensitive information such as SSN and bank account numbers. Users without appropriate permission are not allowed to view this information.

3.   Are the criteria, procedures, controls, and responsibilities regarding access to the system documented?

Yes

(1)   If yes, where?

FAIMIS underwent a C&A prior to being placed into operation in 2010, with an ATO issued on October 21, 2010. The system is undergoing a major change with the move to the CGI Phoenix Data Center and is currently undergoing a full certification and accreditation with an ATO decision expected in July, 2012. As part of the certification process, all system controls including access controls are documented in the CGI Hosted FAIMIS System Security Plan (SSP) which is retained in ADAMS. Other documentation supporting specific controls is also maintained in ADAMS and referred to in the SSP.

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

Yes, the system is accessed from headquarters offices, four regional offices, and from NBC-managed facilities for payment users.

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

At NRC facilities, consistent use is maintained through the use of the agency's LAN/WAN and a standard dedicated telecommunications line.

At NBC facilities, consistent use will be maintained through NBC organizational policies, procedures, and safeguards. Details of these controls will be documented in an Interconnection Security Agreement/Memorandum of Understanding (ISA/MOU) between NRC and NBC.

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

Pre-defined user groups are established for FAIMIS and all groups have access to the system. This information can be found in the FAIMIS SSP.

6. 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 FAIMIS System Requirements Specification (SRS) document as part of FAIMIS business case. FAIMIS captures a record of the User ID with a time and date stamp, table/form or transaction accessed, and action taken. FAIMIS also maintains a record of any batch, report, or interface job run. The Momentum software comprising FAIMIS solution maintains document-based transaction audit history for all financial transactions entered and processed.

7. Will contractors be involved with the design, development, or maintenance of the system?

Yes

If yes, and if this system will maintain information about individuals, ensure Privacy Act and/or PII contract clauses are inserted in their contracts.

- *FAR clause 52.224-1 and FAR clause 52.224-2 should be referenced in all contracts, when the design, development, or operation of a system of records on individuals is required to accomplish an agency function.*

- *PII clause, "Contractor Responsibility for Protecting Personally Identifiable Information" (June 2009), in all contracts, purchase orders, and orders against other agency contracts and interagency agreements that involve contractor access to NRC owned or controlled PII.*

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

Audit logs and system access records are part of Federal Financial Management System requirements. These requirements have been incorporated into FAIMIS System Requirements Specification (SRS) document as part of FAIMIS business case. FAIMIS captures a record of the User ID with a time and date stamp, table/form or transaction accessed, and action taken. FAIMIS also maintains a record of any batch, report, or interface job run. The Momentum software comprising FAIMIS solution maintains document-based transaction audit history for all financial transactions entered and processed.

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

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

FAIMIS underwent a C&A prior to being placed into operation in 2010, with an ATO issued on October 21, 2010. The system is undergoing a major change with the move to the CGI Phoenix Data Center and is currently undergoing a full certification and accreditation with an ATO decision expected in July, 2012.

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

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

Submitting Office: OCFO

A. PRIVACY ACT APPLICABILITY REVIEW

___   Privacy Act is not applicable.

_X_   Privacy Act is applicable.

Comments:

FAIMIS does contain personally identifiable information. FAIMIS operates under the NRC's Privacy Act system of records NRC-32, "Office of the Chief Financial Officer Financial Transactions and Debt Collection Management Records." The system notice can be access at http://www.nrc.gov/reading-rm/foia/privacy-systems.html.

Reviewer's Name	Title	Date
Sally A. Hardy	Privacy Act Program Analyst	May 29, 2012

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

___   No OMB clearance is needed.

___   OMB clearance is needed.

_X_   Currently has OMB Clearance. Clearance No._3150-0188_

Comments:

The information collected from the public for this system has been approved by OMB and assigned the above OMB Clearance Number 3150-0188, Requested for Taxpayer Identification Number.

Reviewer's Name	Title	Date
Tremaine Donnell	Team Leader, Information Collections Team	May 24, 2012

C. RECORDS RETENTION AND DISPOSAL SCHEDULE DETERMINATION

__X__ 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.

Comments:

FAIMIS has an approved records retention schedule #N1-431-10-1, Disposition is Temporary. Cut off at the fiscal year and transfer to inactive storage within FAIMIS data storage. Destroy/delete 10 year after cutoff. Adherence to the disposition is mandatory under 44 U.S.C. 3303a and retention functionality, or a manual process, must be developed to meet this requirement. Unauthorized disposal of official Agency records is punishable by fine, imprisonment or both, under 18 U.S.C. 641 and 2071.

Reviewer's Name	Title	Date
Mary Haynes	Records Management Analyst	May 25, 2012

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.

__X__ 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/   05/30/2012
_____   Date _____
Russell A. Nichols, Chief
Information Services Branch
Information and Records Services Division
Office of Information Services

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

TO**: Reginald Mitchell, Controller, Division of the Controller, Office of the Chief Financial Officer**	

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

Date IRSD received PIA for review: **May 16, 2012**	Date IRSD completed PIA review: **May 29, 2012**

Noted Issues:

FAIMIS will maintain records subject to the Privacy Act.

FAIMIS has approved records retention schedule #N1-431-10-1, Disposition is Temporary. Cut off at the fiscal year and transfer to inactive storage within FAIMIS data storage. Destroy/delete 10 year after cutoff.

Russell A. Nichols, Chief Information Services Branch Information and Records Services Division Office of Information Services	Signature/Date: */RA/* *05/30/2012*

Copies of this PIA will be provided to:

James Shields, Director(Acting)
Business Process Improvement and Applications Division
Office of Information Services

Paul Ricketts,
Senior IT Security Officer (SITSO)
FISMA Compliance and Oversight Team
Computer Security Office