

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.)

Financial Accounting and Integrated Management Information System (FAIMIS)

Date: August 10, 2015

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™ 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 accounts. FAIMIS also includes the functions needed to support the agency's financial reporting requirement.

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 making
- Program spending alerts for key budget items
- Provide real-time and ad hoc reporting capabilities
- Bill and collect NRC License Fee Billing costs

2. What agency function does it support?

FAIMIS is the NRC's core financial management system supporting NRC financial functions and providing the agency's compliance with Federal proprietary and budgetary accounting and financial reporting requirements. FAIMIS also performs the license fee billing and collection, cost accounting, funds control, and capitalized property functions.

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

The modules comprising the 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 the 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 of 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 purchase or development of this system?

31 U.S.C. § 3512;
 31 U.S.C. 1341, 1342, 1349-51, and 1511-19
 31 U.S.C. § 1501 and 1502;
 31 U.S.C. 716; 31 U.S.C. Chapters 35 and 37; 5 U.S.C. 552a;
 31 U.S.C. 6501–6508; 42 U.S.C. 2201; 31 CFR 900–904;
 10 CFR parts 15, 16, 170, 171; Executive Order (E.O.) 9397,
 as amended by E.O. 13478; and E.O. 12731.5

5. What is the purpose of the system and the data to be collected?

Information is collected for the following purposes:

- To Issue payments to individuals and contractors for goods and services received, travel, and payroll
- To bill and collect nuclear regulatory fees, indemnity fees, civil penalties, and other miscellaneous fees and charges
- To bill and collect for reimbursable work performed by the NRC;
- To comply with the IRS requirement that the NRC issue 1099 forms to vendors that the NRC annually pays \$600 or more for which complete TIN information is required
- To fulfill the Office of Personnel Management retirement and personnel requirements.

6. Points of Contact:

Project Manager	Office/Division/Branch	Telephone
Mathew Grow	OCFO/DOC/FSB	301-415-6959
Business Project Manager	Office/Division/Branch	Telephone
Jeffrey Sheldon	OCFO/DOC/FSB	301-415-5743
Technical Project Manager	Office/Division/Branch	Telephone
Jeffrey Sheldon	OCFO/DOC/FSB	301-415-5743
Executive Sponsor	Office/Division/Branch	Telephone
Barbara Gusack	OCFO/DOC	301-415-6054

7. Does this privacy impact assessment (PIA) support a proposed new system or a proposed modification to an existing system?

- a. ___New System XModify 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: April 6, 2012, ADAMS # ML12115A163

(2) **If yes, provide a summary of modifications to the existing system.**

Minor changes such as POC, etc.

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, identify the group(s) of individuals (e.g., Federal employees, Federal contractors, licensees, general public)**

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

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

b. **What information is being maintained in the system about an individual (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?**

To the greatest extent possible, collect information about an individual directly from the individual.

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).

f. Is the information being collected from external sources (any source outside of the NRC)?

Yes

(1) If yes, identify the source 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 information not collected directly from the subject individual be verified as current, accurate, and complete?**

The information from interfacing systems is validated to 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 this system?**

- (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 offices), 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 as stated in B.1.e and B.1.f. Internal sources of information include financial and procurement documents produced in the course of conducting NRC business and programs. External sources of information include documents from vendors and licensees conducting business with the NRC and funding and authorizing documents from oversight agencies such as the U. S. Treasury and the Office of Management and Budget (OMB).

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 the agency's budgetary resources; accomplish proprietary accounting and financial reporting; and, manage fixed

assets. Additionally, the information is used to pay invoices for goods and services received, to bill and collect fees, and to manage vendor and licensee data.

2. Is the use of the data 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 coordination with the Federal Shared Service Provider, CGI, is responsible for the 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 are documented and are included in the data dictionary, the FAIMIS SSP and training materials 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 contained in the SSP and user guides developed prior to implementation of the system. The OCFO will maintain this information electronically.

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

Derived data is obtained from a source for one purpose and then the original information is used to deduce/infer a separate and distinct bit of information that is aggregated to form information that is usually different from the source information.

Aggregation of data is the taking of various data elements and then turning it into a composite of all the data to form another type of data (i.e. tables or data arrays).

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 data be *retrieved* from the system? Will data be retrieved by an individual's name or personal identifier?**

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 appropriate tables and forms. 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 pertaining to the programs and business conducted by the NRC. FAIMIS also provides a tool that allows authorized users the ability to develop reports and export data.

- 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 office 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 approved access.

D. ACCESS TO DATA

- 1. Which NRC office(s) will have access to the data in the system?**

All NRC offices have staff assigned as FAIMIS users.

(1) For what purpose?

NRC office staff have access to enter financial transactions into the system and query the system in order to manage their budgetary resources and meet proprietary accounting needs.

(2) Will access be limited?

Yes, user access is established based on transaction processing and information access needs. User profiles and access are approved by the immediate supervisor and FAIMIS System Administrator.

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

Yes

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

Budget Formulation System
Strategic Acquisition System (STAQS)

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

Via secure file transfer.

3. Will external agencies/organizations/public have access to the data in the system?

No

(1) If yes, who?

(2) Will access be limited?

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

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

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>?
 - 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 expected to a file for transfer based on their approved disposition?

Yes, N1-431-10-1

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 cannot 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 and approved via email by users' managers and sent via email 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 electronically 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 and approved via email by users' managers and sent via email 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?

1) If yes, where?

Yes

FAIMIS underwent a C&A prior to being placed into operation in 2010, with an ATO issued on October 21, 2010. The system had a major change with the move to the CGI Phoenix Data Center and received full certification and accreditation on September 7, 2012, ML12228A394. Currently the ATO has been extended until December 18, 2015 and a new ATO request was submitted on September 2, 2015, ML15232A245. 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)?

The system resides in CGI Phoenix Data Center and will not operate in more than one location.

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 ITI and a standard dedicated telecommunications line.

At the CGI facilities, consistent use will be maintained through the CGI organizational policies, procedures, and safeguards. Details of these controls are documented or referenced in the FAIMIS SSP

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?

FAIMIS underwent a C&A prior to being placed into operation in 2010, with an ATO issued on October 21, 2010. The system had a major change with the move to the CGI Phoenix Data Center and received full certification and accreditation on September 7, 2012, ML12228A394. Currently the ATO has been extended until December 18, 2015 and a new ATO request was submitted on September 2, 2015, ML15232A245. 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.

In addition FAIMIS follows all annual and quarterly security monitoring and testing requirements.

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

The system had a major change with the move to the CGI Phoenix Data Center and received full certification and accreditation on September 7, 2012, ML12228A394. Currently the ATO has been extended until December 18, 2015 and a new ATO request was submitted on September 2, 2015, ML15232A245.

PRIVACY IMPACT ASSESSMENT REVIEW/APPROVAL
(For Use by OIS/CSD 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

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."

Reviewer's Name	Title	Date
Sally A. Hardy	Acting Privacy Officer	September 15, 2015

B. INFORMATION COLLECTION APPLICABILITY DETERMINATION

No OMB clearance is needed.

OMB clearance is needed.

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
Kristen Benney	Senior Information Management Analyst	9/14/15

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.

Comments:

FAIMIS has an approved records retention schedule, #N1-431-10-1, Disposition is **Temporary**: Cut off at the end of the fiscal year and transfer to inactive storage within FAIMIS data storage. Destroy/delete ten years after cut off.

OIS will follow-up with OCFO to determine how retentions are being implemented as adherence to the retention schedule is mandatory under 44 U.S.C 3303a(d). Retention functionality or a manual process must be developed to meet this requirement.

Reviewer's	Title	Date
Mary Haynes	Records Management Analyst	September 15, 2015

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/
 Roger Andoh, Acting Chief
 FOIA, Privacy, and Info Collections Branch
 Customer Service Division
 Office of Information Services

Date 9/17/15

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

To: Barbara K. Gusack, Controller, Division of the Controller, Office of the Chief Financial Officer	
Name of System: Financial Accounting and Integrated Management Information System (FAIMIS)	
Date PIA received for review: September 8, 2015	Date PIA review completed: September 15, 2015
Noted Issues:	
Roger Andoh, Acting Chief FOIA, Privacy, and Info Collections Branch Customer Service Division Office of Information Services	Signature/Date: /RA/ 9/17/15
<p><i>Copies of this PIA will be provided to:</i></p> <p><i>John Moses, Director Solutions Develop Division Office of Information Services</i></p> <p><i>Kathy Lyons-Burke Senior IT Security Officer (SITSO) FISMA Compliance and Oversight Team Computer Security Office</i></p>	