

# PRIVACY IMPACT ASSESSMENT Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)



#### **Department of Energy**

Privacy Impact Assessment (PIA)

Guidance is provided in the template. See DOE Order 206.1, *Department of Energy Privacy Program*, Appendix A, Privacy Impact Assessments, for requirements and additional guidance for conducting a PIA: <a href="https://www.directives.doe.gov/directives-documents/200-series/0206.1-BOrder-chg1-minchg/@@images/file.">https://www.directives.doe.gov/directives-documents/200-series/0206.1-BOrder-chg1-minchg/@@images/file.</a>

Please complete form and return via email to Privacy@hq.doe.gov

No hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT		
Date	April 17, 2023	
Departmental Element & Site	Office of the Chief Financial Officer, Headquarters - Office of the Chief Information Officer (OCIO) EITS Data Center and Cloud Services (DCCS) environment	
Name of Information System or IT Project	Department of Energy Payroll Processing (DPP)	
Exhibit Project UID	019-000000122	
New PIA Update	This is an updated PIA from the one approved on January 27, 2022. Minor editorial changes have been made and several pages have been updated with the names of new officials.	
	Name, Title	Contact Information Phone, Email
System Owner	Logan Kwedar Office of Corporate Business Systems (CF-40) Office of the Chief Financial Officer (CF) U.S. Department of Energy	(301) 903-2145 Logan.Kwedar@hq.doe.gov





## Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

MODULE I – PRIVACY NEEDS ASSESSMENT		
Local Privacy Act Officer	Ana Manchester Office of Corporate Business Systems (CF-40) Office of the Chief Financial Officer (CF) U.S. Department of Energy	301-903-9360 Ana.Manchester@hq.doe.gov
Cyber Security Expert reviewing this document (e.g., ISSM, CSSM, ISSO, etc.)	Robert Baring, ISSO Office of Corporate Business Systems (CF-40) Office of the Chief Financial Officer (CF) U.S. Department of Energy	240-243-5796 robert.baring@hq.doe.gov
Person Completing this Document	Robert Baring, ISSO Office of Corporate Business Systems (CF-40) Office of the Chief Financial Officer (CF) U.S. Department of Energy	240-243-5796 robert.baring@hq.doe.gov
	The Department of Energy Payroll Processing (DPP) manages payroll services for entire U.S. Department of Energy (DOE). DPP implements the DOE portion by collect payroll data from over 48 DOE sites and delivering the collected information to the Defe Finance and Accounting Service (DFAS), which is operated by the U.S. Department Defense (DOD).  DPP processes SSN and Clearance Information for DOE Employees and some contract DPP processes employment related data for DOE. DPP processes much more liminformation for some contractors including employer name.	
DPP employs a set of internal controls to ensure the accuracy and currency of information  System or IT  Project  DPP employs a set of internal controls to ensure the accuracy and currency of incompany contained in the system in light of new additions or deletions from payroll or pay. DPP is composed of its software, scripts, and temporary files. DPP access not include database information hosted by the Office of the Chief Information (IM). These are hosted by IM virtual servers, which offer the inheritance of the physical and operating system level security controls. DPP does not include servers, which are authorized separately by IM.		deletions from payroll or changes in mporary files. DPP accesses but does fice of the Chief Information Officer ich offer the inheritance of multiple
	DPP uses Energy Information Technology Services (EITS) Active Directory accounts to control all System Administrator access for the administration of the system. All DPP access is remote. All System Administrator account access is authorized prior to granting access. All DPP functionality is privileged. DPP restricts privileged accounts exclusively to authorized DPP support personnel.	





#### Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

#### **MODULE I – PRIVACY NEEDS ASSESSMENT** Social Security Number (SSN) Medical & Health Information Financial Information - Employee's disability information and Health Benefits Plan Clearance Information Type of ☐ Biometric Information Information Mother's Maiden Name Collected or Date of Birth **Maintained by** Place of Birth the System: Employment Information Criminal History Name, Phone, Address Other – Potential Personally Identifiable Information (PII): Security Questions/Responses (chosen and populated by employee) N/A Has there been any attempt to verify PII does not exist on the system? DOE Order 206.1, Department of Energy Privacy Program, defines PII as any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name. Social Security number, date and place of birth, mother's maiden name, biometric data, and including any other personal information that is linked or linkable to a specific individual. If "Yes," what method was used to verify the system did not N/A contain PII? (e.g., system scan) **Threshold Questions** 1. Does system contain (collect and/or maintain), or plan to contain Yes any information about individuals? 2. Is the information in identifiable form? Yes No 3. Is the information about individual Members of the Public? Yes, the system contains information 4. Is the information about DOE or contractor employees? about current and former DOE federal





# PRIVACY IMPACT ASSESSMENT Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

MODULE I – PRIVACY NEEDS ASS	MODULE I – PRIVACY NEEDS ASSESSMENT	
	employees. It also contains some information on contractors that are responsible for operating the system (i.e., timekeepers and application support staff).	
	<ul><li>☐ Federal Employees</li><li>☐ Contractor Employees</li></ul>	

If the answer to <u>all</u> four (4) Threshold Questions is "**No**," you may **proceed to the signature page** of the PIA. Submit the completed PNA with signature page to the CPO.

Module II must be completed for all systems if the answer to any of the four (4) threshold questions is "Yes." All questions must be completed. If appropriate, an answer of N/A may be entered.

The goal of the threshold questions is to legitimately and efficiently determine whether additional assessment is necessary. If there is doubt, it is in the System Owner's best interest to complete Module II.

PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.

# **END OF PRIVACY NEEDS ASSESSMENT**

# **MODULE II - PII SYSTEMS & PROJECTS**

**AUTHORITY, IMPACT & NOTICE** 





#### Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

### **MODULE II – PII SYSTEMS & PROJECTS**

#### 1. AUTHORITY

What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?

- Department of Energy Authorization Act, Title 42, United States Code (U.S.C), Section 7101 et. seq.
- 50 U.S.C. 2401 et. seq.

#### 2. CONSENT

What opportunities do individuals have to decline to provide information (e.g., where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?

Data provided via a corporate repository (DOEInfo) contains information on the DOE Federal workforce obtained from individuals. DPP accesses information therefrom as a condition of employment for the sole purpose of facilitating compensation.

#### 3. CONTRACTS

Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts? Contractors are involved in the design, development, and maintenance of the system. Contractor roles include both system administration and information administration and processing. Personal information may be disclosed to these contractors and their officers and employees in performance of their contracts. The individuals provided this type of information are subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need-to-know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and the requirements of the DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.





# PRIVACY IMPACT ASSESSMENT Office of Chief Financial Officer

Department of Energy Payroll Processing (DPP)

### **MODULE II – PII SYSTEMS & PROJECTS**

#### 4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

DOE has assessed the system as moderate risk according to the criteria set forth in Federal Information Processing Standard (FIPS) 199 established by the National Institute of Standards and Technology (NIST). The risk rating is used to determine the effect to the agency should the system's confidentiality, integrity or availability be compromised.

The unauthorized disclosure of information is expected to have a serious adverse effect on individuals. DPP contains sensitive PII on DOE employees including SSN and limited financial information for payroll purposes. Should this information be compromised, it would pose a potentially significant risk to individuals and could result in professional or financial harm stemming from the loss or exposure of financial information, employment information including clearance data, and SSN.

DPP is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:

- Strict access control enforcement based on need-to-know
- Encryption

Security controls have been implemented and processes are in place to ensure that controls are operating effectively to mitigate the risk of the data being compromised. These include technical controls as well as role-based access controls, further restricting System Administrators to authorized data.

#### 5. SORNs

How will the data be retrieved? Can PII be retrieved by an identifier (e.g., name, unique number or symbol)?

If yes, explain, and list the identifiers that will be used to retrieve information on the individual.

PII data can be retrieved through elevated privilege accounts within the DPP system through the following identifiers: SSN, GUID, GUID16, EMPNUM and DOE EMPLID.





# Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

MODULE II – PII SYSTEMS & PROJECTS		
6. SORNs  Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register?  If "Yes," provide name of SORN and location in the Federal Register.	<ul> <li>DOE-13, Payroll and Leave Records, 74 FR 1012</li> <li>DOE-18, Financial Accounting System, 74 FR 1020</li> </ul>	
7. SORNs  If the information system is being modified, will the SORN(s) require amendment or revision?	N/A	
DATA SOURCES		
8. What are the sources of information about individuals in the information system or project?	Data is provided through an interface with a corporate repository (DOEInfo).	
9. Will the information system derive new or meta data about an individual from the information collected?	No	
10. Are the data elements described in detail and documented?	Yes. These data elements are addressed in the system documentation for DPP.	
DATA USE		
11. How will the PII be used?	All data collected is used by DFAS for internal Departmental reporting (CF-10) and to ensure that individuals are accurately paid.	
<ul><li>12. If the system derives meta data, how will the new or meta data be used?</li><li>Will the new or meta data be part of an individual's record?</li></ul>	The system does not generate new or meta data.	





# Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

MODULE II – PII SYSTEMS & PROJECTS		
13. With what other agencies or entities will an individual's information be shared?	The system provides payroll data to DoD for purposes of completing the payroll process.	
Reports		
14. What kinds of reports are produced about individuals or contain an individual's data?	The following reports may be produced on individuals:  • Employee information (name, team, tour of duty)  • Uncertified employees  • Employees with Missing time  • Team/Roster Listing of timekeepers and certifiers  • Retroactive Data Uncertified Employees  • Add  • SAL_BEN  • DANGERPAY  • MANPOWER  • RECON  • 453 Error Report	
15. What will be the use of these reports?	Timekeepers, Certifiers, and other select individuals are granted access to these reports in order to ensure the accuracy of time and attendance data. Reports are not available to the general public.	
16. Who will have access to these reports?	Timekeepers, Certifiers, and other employees or contractors whose job functions require access to this information.	
Monitoring		
17. Will this information system provide the capability to identify, locate, and monitor individuals?	System audit logs are maintained to record system activity and Administrator activity for limited security purposes to ensure the integrity of the system.	
18. What kinds of information are collected as a function of the monitoring of individuals?	For security purposes, system audit logs are maintained to record system activity and Administrator activity. This activity includes invalid logon attempts and access and modification to data in the system.	
	The Operating System/Server logs maintained by the EITS environment contains IP information; this is separate from the application/database logging specific to DPP.	





#### Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

### **MODULE II – PII SYSTEMS & PROJECTS**

19. Are controls implemented to prevent unauthorized monitoring of individuals?

DPP has established policies and procedures for controlling and monitoring access to the system. These are defined in the Security Plan and are compliant with privacy controls in NIST 800-53, rev 4.

#### **DATA MANAGEMENT & MAINTENANCE**

How will records about
individuals be kept current and
verified for accuracy, relevance
and completeness? Include PII
data collected from sources
other than DOE records.

The accuracy of the data in the system is verified at the close of every pay period (every two weeks) by authorized DOE system administration staff.

21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?

The system is only maintained at DOE HQ in the EITS DC&SS. Privileged access to the system is only available within DOENET using 2 factor authentication. The system operates in the Microsoft Azure Cloud.

Records relating to employee compensation such as time and attendance

#### **Records Management**

		records.
22. Identify the re	cord(s).	

The Department of Energy Payroll Processing (DPP) manages payroll services for the entire U.S. Department of Energy (DOE).

23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.

Payroll program administrative records. Records produced in administering and operating payroll functions of a general nature and not linked to an individual employee's pay: GRS 2.4, item 60 and 61

Employee Compensation and Benefits Records: GRS 2.4, item 030

24. Records Contact

Sean Kennedy Sean.Kennedy@hq.doe.gov 240-315-6772

**ACCESS, SAFEGUARDS & SECURITY** 





#### Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

#### **MODULE II – PII SYSTEMS & PROJECTS** Through the Office of the Chief Financial Officer's (CF) Assessment and Accreditation program and annual assessment processes, all baseline security controls have been implemented and tested as appropriate to its Federal Information Processing (FIPS) categorization in accordance with the Senior DOE Management Program Cyber Security Plan (PCSP) and DOE Directives. The system was certified and accredited with full Authority To Operate and found to have mitigated risk to an acceptable level. Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The technical controls include restricted 25. What controls are in place to access via Role Based Access Controls (RBAC) and Single Sign On (SSO) protect the data from leveraging OneID integration. These access controls are defined in the unauthorized access. system security plan. All system team members (Federal and contractor) are modification or use? required to take the DOE standard cyber security certification course as a prerequisite for the system access. Data encryption is involved with DPP, per the System Security Plan. Rules of behavior and consequences for violating the rules are displayed to the user each time the user logs onto the system. Administrative controls include non-disclosure agreements, role-based access so individuals only have access to appropriate personal information, and use of system audit logs to monitor access and user activity in the system. DOE Federal and contractor personnel with authorized access to DOE networks will have access to their own data in the system. Access to others' PII will be strictly controlled based on job responsibility and function. 26. Who will have access to PII System Administrators and help desk staff will have access to all data in the data? system. Payroll personnel have access to data for those individuals they are responsible to administer. System Access control lists are established to allow System Administrators access to only view and change data for which they are responsible. Payroll 27. How is access to PII data personnel have access to data for those individuals they are responsible to determined? administer. 28. Do other information systems Yes, the system provides data to the Defense Civilian Pay System (DCPS) share data or have access to for purposes of completing the payroll process. the data in the system? If yes, explain.





#### Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

#### **MODULE II – PII SYSTEMS & PROJECTS** 29. For connecting information systems, is there an There is an Interconnection Security Agreement (ISA) with Defense Finance **Interconnection Security** & Accounting Service (DFAS) and a Data Interface Agreement (DIA) with Agreement (ISA) or other Bonneville Power Administration (BPA). agreement between System Owners to ensure the privacy of individuals is protected? 30. Who is responsible for ensuring System Owner, the Chief Financial Officer, and the Director for Corporate the authorized use of personal Business Systems. information?

# **END OF MODULE II**





# PRIVACY IMPACT ASSESSMENT Office of Chief Financial Officer Department of Energy Payroll Processing (DPP)

SIGNATURE PAGE		
	Signature	Date
System Owner	Logan Kwedar (Print Name)  (Signature)	
Local Privacy Act Officer	Ana Manchester (Print Name)  (Signature)	
Chief Privacy Officer	William K. Hunt  (Print Name)  (Signature)	

