



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

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| Affects Members Of the Public? | <input type="checkbox"/> |
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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: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

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

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| Date | January 6, 2025 | |
| Departmental Element & Site | Office of the Chief Financial Officer, Headquarters | |
| Name of Information System or IT Project | Standard Accounting and Reporting System (STARS) | |
| Exhibit Project UID | 019-000000122 | |
| New PIA <input type="checkbox"/> | This is an updated PIA from the one approved May 3, 2018. | |
| Update <input checked="" type="checkbox"/> | | |
| | Name, Title | Contact Information Phone, Email |
| System Owner | Somashekar Krishnamurthy Office of Corporate Business Systems, CF-40 Germantown, U.S. Department of Energy | (301)-903-2145 Somashekar.krishnamurthy@hq.doe.gov |
| Local Privacy Act Officer | Ana Manchester, ISSM Office of Corporate Business Systems, CF-40 Germantown, U.S. Department of Energy | (301)-903-9360 ana.manchester@hq.doe.gov |



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE I – PRIVACY NEEDS ASSESSMENT

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| Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.) | Ana Manchester, ISSM Office of Corporate Business Systems, CF-40 Germantown, U.S. Department of Energy | (301)-903-9360 ana.manchester@hq.doe.gov |
| Person Completing this Document | Suzette Bailey-Jones Office of Corporate Business Systems, CF-40 Germantown, U.S. Department of Energy | 240-243-5532 suzette.bailey-jones@hq.doe.gov |
| Purpose of Information System or IT Project | <p>The Standard Accounting and Reporting System (STARS) is the official accounting system for the Department of Energy. STARS provides a centralized system operated from a single accounting center, and a single payment center. STARS is built upon Joint Financial Management Improvement Program (JFMIP) certified Oracle Federal Financials Applications. It provides support for general ledger, accounts payable / receivable, fixed assets, funds control, and financial and cost accounting, and limited purchasing functionality. STARS includes budget execution functionality associated with recording appropriations, apportionments, allotments, sub-allotments, commitments, obligations, costs, and funds control.</p> <p>STARS integrates performance metrics with budget, obligations, and costs, and provides standard federal financial reporting and strong, ad-hoc query and reporting capability. Employee Data can be retrieved by Employee Tax Identification number (TIN), name, or Employee ID. But the practice generally is to search the data by name. Supplier/Vendor record can be retrieved by TIN, invoice number, or supplier name.</p> <p>Access to these search screens is limited to only a handful of people within the Financial Services Team (FST) and Supplier Team. As part of the bi-annual STARS user certification these access responsibilities are reviewed, and appropriate steps are taken if the access needs to be revoked.</p> | |
| Type of Information Collected or Maintained by the System: | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Social Security number (SSN) <input type="checkbox"/> Medical & Health Information <input checked="" type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> Date of Birth and Place of Birth <input checked="" type="checkbox"/> Employment Information | |



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE I – PRIVACY NEEDS ASSESSMENT

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| | <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify - Taxpayer Identification Number (TIN) of corporations |
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| <p>Has there been any attempt to verify PII does not exist on the system?</p> <p><i>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.</i></p> | N/A |
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| <p>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</p> | N/A |
|---|-----|

Threshold Questions

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| <p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p> | Yes |
| <p>2. Is the information in identifiable form?</p> | Yes |
| <p>3. Is the information about individual Members of the Public?</p> | No |
| <p>4. Is the information about DOE or contractor employees?</p> | <p>Yes</p> <p><input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> Contractor Employees</p> <p>The categories of individuals include employees, contractor employees, and vendors who either are due money from or owe money to the Department of Energy (DOE).</p> |

If the answer to **all** 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.



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE I – PRIVACY NEEDS ASSESSMENT

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



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

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| <p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p> | <p>Department of Energy Authorization Act, Title 42, United States Code (U.S.C), Section 7101 et. seq.</p> <p>There are no other additional sources of authority for this system.</p> |
| <p>2. CONSENT</p> <p>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)?</p> | <p>For individuals to be reimbursed for products and services provided, they are required to provide this information. This information is used only to perform the required accounting functions.</p> |
| <p>3. CONTRACTS</p> <p>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?</p> | <p>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 is 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.</p> <p>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.</p> |



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

DOE has assessed STARS as a moderate-risk systems according to the criteria set forth in Federal Information Processing Standard 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 organizational operations, organizational assets, or individuals. Security controls have been implemented and processes are in place to ensure that controls are operating effectively to mitigate the risk of STARS from being compromised. These include role-based access, further restricted to only the data authorized for their organizations use) and display of a full 9-digit SSN to a few key users (primarily within the Payment Services Center) – all others with any SSN access are limited to only the last four digits of the SSN.

STARS has 3 responsibilities where users can see SSN. These responsibilities are used to create a new employee in STARS or update some employee information. The responsibilities are given to STARS users using IRC and subject to approval. There is a bi/semiannual review of the responsibilities and action taken based on the user's job description.

- DOE Accounts Payable (AP) and Federal Vertical (FV) Administrator
- DOE Purchase Order (PO) Application Administration
- DOE Employee Update

Authorized users of the system are the subject of an adjudicated background investigation and receive extensive training on the use and protection of PII. The system maintains the minimum PII necessary for its business purpose to mitigate privacy harm. In addition, use of the PII in is limited to clearly defined business purposes. Security controls have been implemented and processes are in place to ensure that access is restricted.

STARS 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
- Password Protection
- Administrative controls
- System reviews



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE II – PII SYSTEMS & PROJECTS

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| | <p>Any issues previously identified are evaluated and corrected consistent with Management’s direction as documented within the Assessment and Authorization (A&A) process.</p> |
| <p>5. SORNs</p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p> | <p>Data is retrievable only by name, taxpayer identification number, voucher, and invoice or payment reports.</p> |
| <p>6. SORNs</p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p> | <p>The system operates under the following Privacy Act systems of records:</p> <ul style="list-style-type: none"> • DOE-18 Financial Accounting System |
| <p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p> | <p>STARS is not collecting new or additional information. The current Systems of Records do not require amendment or revision.</p> |

DATA SOURCES



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE II – PII SYSTEMS & PROJECTS

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| <p>8. What are the sources of information about individuals in the information system or project?</p> | <p>Personal employee information is not obtained from individuals, but is obtained from the following internal and external information sources:</p> <p>DOE Internal:</p> <ul style="list-style-type: none"> DOE Employee Data Repository (DOEInfo) <p>External:</p> <ul style="list-style-type: none"> E-Gov Travel Service (ETS2) |
| <p>9. Will the information system derive new or meta data about an individual from the information collected?</p> | <p>No</p> |
| <p>10. Are the data elements described in detail and documented?</p> | <p>Yes, data elements are described in the Oracle documentation.</p> |
| DATA USE | |
| <p>11. How will the PII be used?</p> | <p>The system generates invoice monitoring and payment status reports, and reports for the Department of Treasury that contains personal information. These reports are used to verify, certify and batch payments and monitor the status of invoices. PII information is only used to perform the required accounting functions.</p> |
| <p>12. If the system derives meta data, how will the new or meta data be used?</p> <p>Will the new or meta data be part of an individual's record?</p> | <p>N/A</p> |
| <p>13. With what other agencies or entities will an individual's information be shared?</p> | <p>Accounting and financial information will be shared with Department of Treasury and Federal Reserve Bank.</p> |

Reports



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE II – PII SYSTEMS & PROJECTS

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| 14. What kinds of reports are produced about individuals or contain an individual's data? | <p>Reports may be produced to contain any of the information maintained in the system database. Types of standard reports include:</p> <ul style="list-style-type: none"> Cost reports Allotment reports Unobligated funds Site specific reports |
| 15. What will be the use of these reports? | <p>These reports will be used to verify, certify and batch payments and monitor the status of invoices.</p> <p>Reports are generated by authorized users.</p> <p>STARS data is included in the DATA Act reporting, which is available to the public, but this reporting does not include PII data.</p> |
| 16. Who will have access to these reports? | <p>The system allows authorized DOE staff to query and produce reports on individuals or groups of individuals.</p> <p>Data can be accessed and viewed based on user permissions.</p> |
| Monitoring | |
| 17. Will this information system provide the capability to identify, locate, and monitor individuals? | <p>Yes, for the limited use of security purposes, system audit logs are maintained to record system activity and user activity.</p> |
| 18. What kinds of information are collected as a function of the monitoring of individuals? | <p>For security purposes system audit logs are maintained to record system activity and user activity. This activity includes invalid logon attempts and access and modification to data in the system.</p> <p>The Operating System/Server logs maintained by the EITS environment contain IP information, this is separate from the application/database logging specific to STARS.</p> |
| 19. Are controls implemented to prevent unauthorized monitoring of individuals? | <p>STARS established policies and procedures for controlling and monitoring access to the system. These are defined in the Security Plan for STARS and are compliant with privacy controls in NIST 800-53.</p> |

DATA MANAGEMENT & MAINTENANCE



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE II – PII SYSTEMS & PROJECTS

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| <p>20. 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.</p> | <p>The system is designed to automatically verify the accuracy, including whether the data is current, and the completeness of data input to the system. The system will compare the data inputted using field edits. For example, a name, address and taxpayer identification number would be checked against the system record data, which are DOE records collected and verified by other systems prior to being placed in STARS. If this information does not match, transactions involving this data will fail and a notification requiring corrective measures and actions will be sent to the appropriate responsible person. This may involve manual verification and correction of data in the system.</p> |
| <p>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</p> | <p>System is only maintained at DOE HQ Azure GovCloud in the EITS DC&SS – though it may be accessed by authorized users from any internal DOENET access point.</p> |
| Records Management | |
| <p>22. Identify the record(s).</p> | <p>Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting; records related to agency financial statements and related audits; and property, plant, and equipment</p> |
| <p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p> | <p>The records in STARS have not yet been scheduled electronically but would fall under: Financial Management and Reporting Records DOE or GRS 1.1, items 010, 011, 020, 030, 040, and 050</p> |
| <p>24. Records Contact</p> | <p>Sean Kennedy, Records Manager Sean.Kennedy@hq.doe.gov 240-315-6772</p> |

ACCESS, SAFEGUARDS & SECURITY



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE II – PII SYSTEMS & PROJECTS

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| <p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p> | <p>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 (ATO) and found to have mitigated risk to an acceptable level.</p> <p>Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The technical controls include restricted access via user-id and password based on user responsibility and job function. These access controls are defined in the system security plan. All system team members (Federal and contractor) are required to take the DOE standard cyber security certification course as a prerequisite for the system access. 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.</p> |
| <p>26. Who will have access to PII data?</p> | <p>DOE Federal and contractor personnel have access to the data in STARS.</p> <p>Access to personal data in the system will be strictly controlled based on job responsibility and function. Generally, personal data has been removed or masked within the inquiry, non-system set-up, and non-Treasury payment related responsibilities.</p> <p>Senior manager review and approval is required prior to assigning access rights to users. Since the production environment is fluid (i.e., new users being added/ user access being removed/changing job responsibilities) reports are generated on a regular basis and reviewed to ensure access rights continue to align with roles/job responsibilities assigned to an individual and minimize access to privacy information to only those requiring it in order to perform their job responsibilities. Information including PII data is shared as required with Department of Treasury and the Federal Reserve Bank to facilitate financial transactions.</p> |



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

MODULE II – PII SYSTEMS & PROJECTS

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| 27. How is access to PII data determined? | Access to data is determined by evaluation of personnel job responsibilities and functions. Based on the evaluation, access control lists are documented and applied to the system. System controls and integrity reports are reviewed on a regular basis to ensure users have the appropriate level of access. |
| 28. Do other information systems share data or have access to the data in the system? If yes, explain. | Yes. All existing external interfaces have a Data Interconnection Agreement. |
| 29. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected? | <p>Yes. Data Interface Agreements (DIAs) are in place for both system interconnections:</p> <p>Internal:</p> <ul style="list-style-type: none"> • Budget Formulation and Distribution System (BFADS) • DOEINFO • Working Capital Fund (WCF) • Corporate Human Resource Information System (CHRIS) • Vendor Inquiry Payments Electronic Reporting System (VIPERS) • Financial Accounting Support Tool (FAST) • Data Warehouse (IDW) • Strategic Integrated Procurement Enterprise System (STRIPES) • Non-Integrated Contractor Cost Driver • Energy Efficiency and Renewable Energy (EERE) • National Energy Technology Laboratory (NETL) <p>External:</p> <ul style="list-style-type: none"> • Department of Treasury Enterprise Security Controls (ESC) • Concur (CGE) • System for Award Management (SAM) • Integrated Contractor (STARSIO) |
| 30. Who is responsible for ensuring the authorized use of personal information? | System Owner, the Chief Financial Officer, and the Director for Corporate Business Systems. |

END OF MODULE II



PRIVACY IMPACT ASSESSMENT:
Office of Chief Financial Officer
STARS

SIGNATURE PAGE

| | Signature | Date |
|----------------------------------|--|-------|
| System Owner | <p>Somashekar Krishnamurthy</p> <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p> | <hr/> |
| Local Privacy Act Officer | <p>Ana Manchester</p> <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p> | <hr/> |
| Chief Privacy Officer | <p>William K. Hunt</p> <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p> | <hr/> |