U.S. Department of the Interior
PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the DOI PIA Guide for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

Name of Project: Budget Execution Reporting Tool (BERT)
Date: July 1, 2020
Bureau/Office: Office of the Secretary/Office of Budget

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Section 1. General System Information

   A. Is a full PIA required?

      ⊠ Yes, information is collected from or maintained on
         ☐ Members of the general public
         ⊠ Federal personnel and/or Federal contractors
         ☐ Volunteers
         ☐ All

      ☐ No:

   B. What is the purpose of the system?
    .

    The Budget Execution Reporting Tool (BERT) is an intranet-delivered application that enables OS leaders and staff to determine the execution status of programs and accounts on a near real-time basis, to access the data at various levels (e.g., appropriation, fund, fund center, functional area, and program) and download the information to Microsoft Excel or PDF format for local use

and analysis. BERT data imports from the Financial and Business Management System (FBMS), the budget system of record, and are loaded into a local Oracle database on an automated basis each night.

C. What is the legal authority?

5 U.S.C. 301, 3101, 5105–5115, 5501– 5516, 5701–5709; 31 U.S.C. 66a, 240– 243; 40 U.S.C. 483(b); 43 U.S.C. 1467; 44 U.S.C. 3101; Executive Order 11807; Office of Management and Budget (OMB) Circular A-11, "Preparation, Submission, and Execution of the Budget"

D. Why is this PIA being completed or modified?

☐ New Information System
☐ New Electronic Collection
☐ Existing Information System under Periodic Review
☐ Merging of Systems
☒ Significantly Modified Information System
☐ Conversion from Paper to Electronic Records
☐ Retiring or Decommissioning a System
☐ Other: *Describe*

E. Is this information system registered in CSAM?

☒ Yes: Budget Execution Reporting Tool (BERT) System Security and Privacy Plan
☐ No

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

Subsystem Name	Purpose	Contains PII *(Yes/No)*	Describe *If Yes, provide a description.*
None			

G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?

☒ Yes:

The OS BERT system contains labor hours/costs associated to DOI employees and this information is to be used by the Department's budget office for the purpose of financial planning. The records within OS BERT are covered under INTERIOR/DOI-85, Payroll, Attendance, Retirement, and Leave Records, July 19, 2018, , 83 FR 34156. DOI-85 is the

official system of records that manages the personnel and payroll functions, to ensure proper payment for salary and benefits which is executed in FBMS. The DOI-85 SORN can be viewed at https://www.doi.gov/privacy/sorn.

☐ No

H. Does this information system or electronic collection require an OMB Control Number?

☐ Yes: *Describe*
☒ No

Section 2. Summary of System Data

A. What PII will be collected? Indicate all that apply.

☒ Name
☐ Citizenship
☐ Gender
☐ Birth Date
☐ Group Affiliation
☐ Marital Status
☐ Biometrics
☐ Other Names Used
☐ Truncated SSN
☐ Legal Status
☐ Place of Birth
☐ Religious Preference
☐ Security Clearance
☐ Spouse Information
☒ Financial Information
☐ Medical Information
☐ Disability Information
☐ Credit Card Number
☐ Law Enforcement
☐ Education Information
☐ Emergency Contact
☐ Driver's License
☐ Race/Ethnicity
☐ Social Security Number (SSN)
☐ Personal Cell Telephone Number
☐ Tribal or Other ID Number

☐ Personal Email Address
☐ Mother's Maiden Name
☐ Home Telephone Number
☐ Child or Dependent Information
☐ Employment Information
☐ Military Status/Service
☐ Mailing/Home Address
☒ Other: *Specify the PII collected.* Employee common identifier (ECI)

BERT will contain labor hours/costs associated to DOI employees by the ECI. This information is to be used by the Department's budget office for the purpose of financial planning.

The system will also include separation dates that are manually entered.

B. What is the source for the PII collected? Indicate all that apply.

☐ Individual
☐ Federal agency
☐ Tribal agency
☐ Local agency
☒ DOI records
☐ Third party source
☐ State agency
☐ Other: *Describe*

C. How will the information be collected? Indicate all that apply.

☐ Paper Format
☐ Email
☐ Face-to-Face Contact
☐ Web site
☐ Fax
☐ Telephone Interview
☒ Information Shared Between Systems
☒ Other:

Some BERT data is manually entered by Administrative staff members. Administrative staff members manually enter employee separation dates into OS BERT and this information is included in the Federal Personnel and Payroll System (FPPS).

D. What is the intended use of the PII collected?

BERT will use this information to accurately forecast payroll expenses for current and future budget fiscal years, as well as to perform cost trend analysis on prior years' data. PII will be used to develop reports at the individual and organizational level to support payroll funding at the appropriate level.

E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.

☒ Within the Bureau/Office:

PII will be used by authorized budget staff and leadership within the Office of the Secretary for budget forecasting.

☒ Other Bureaus/Offices:

A small number of BERT users within the Bureau of Indian Affairs (BIA)budget office also access BERT for the purposes of budget reporting; their access is limited to AS-IA data.

☐ Other Federal Agencies:

☐ Tribal, State or Local Agencies:

☒ Contractor:

DOI contractors who support BERT and the budget formulation process may have authorized access to PII.

☐ Other Third Party Sources:

F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?

☐ Yes:
☒ No:

The information is not collected directly from individuals. The information is received from the Financial and Business Management System (FBMS) via an interface. The OS BERT system contains labor hours/costs associated to DOI employees and this information is to be used by the Department's budget office for the purpose of financial planning.

G. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

☐ Privacy Act Statement:

☒ Privacy Notice: Notice is provided to individuals through the publication of the DOI-85 SORN and the publication of this PIA.

☐ Other:

☐ None

H. How will the data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).

The records will be retrieved by the - employee's name, Employee Common Identifier (ECI) used in FBMS.

I. Will reports be produced on individuals?

☒ Yes:

BERT will use this information to accurately forecast payroll expenses for current and future budget fiscal years, as well as to perform cost trend analysis on prior years' data. BERT will be used by authorized budget staff and leadership with the Office of the Secretary. A small number of BERT users within the BIA budget office also access BERT for the purposes of AS-IA budget reporting; their access is limited to AS-IA data. Reports will include information such as employee name, Employee Common Identifier (ECI), labor grade, pay/benefits rates, hours worked, and onboard/separation date.

☐ No

Section 3. Attributes of System Data

A. How will data collected from sources other than DOI records be verified for accuracy?

Not applicable. The BERT PII data will come solely from DOI internal sources.

B. How will data be checked for completeness?

BERT data is validated twice a week through a semi-automated comparison with the totals in the FBMS Enterprise management Information System (EMIS) module. In 2020, BERT and FBMS are coordinating a more heavily automated comparison process to allow this reconciliation to occur nightly.

C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

BERT receives a nightly data feed from FBMS (see sections B and C). As part of this nightly data refresh process, BERT logs any errors and also notifies the development team via email of the status (success/failure) of the data load. Additionally, for each data refresh, BERT logs the date/time of initiation, the date/time of completion, the completion status, and the number of records loaded. BERT logs are kept in its internal Oracle database.

D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.

Data within the system will be maintained and destroyed in accordance with the Departmental Records Schedule (DRS) Administrative Bucket DAA-0048-2013-0001-0011, Long Term Financial and Acquisitions Records. Data is maintained by fiscal year, and purged 7 years after cutoff.

E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?

Data will be maintained in accordance with the Departmental Records Schedule DAA-0048-2013-0001-0011, Long Term Financial and Acquisitions Records for 7 years, and purged after the retention has been met. The BERT development team will be responsible for annual records cleanup. This process will involve deleting data from the Oracle database.

F. Briefly describe privacy risks and how information handling practices at each stage of the "information lifecycle" (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.

BERT has a moderate security categorization in accordance with the Federal Information Security Modernization Act of 2014 and National Institute of Standards and Technology guidelines. DOI has implemented a series of administrative, technical and physical measures to mitigate the risks and ensure appropriate security and privacy controls are in place. PII in BERT is limited to name, ECI, labor hours/costs, pay rates, and employee onboarding and separation dates, which are used to accurately forecast payroll expenses and to perform budget cost trend analysis. The ECI is used as an alternative to Social Security numbers to protect privacy and mitigate risk.

BERT does not interface with external systems outside the Department, and since it is only accessible from inside the DOI LAN, does not allow access by users from outside the Department. BERT will receive PII data from FBMS. BERT will be a subsystem of OCDB and will inherit its security and privacy controls governing network, server, and facility access. In addition, BERT has its own internal authorization and auditing controls.

The risk of data interception in transit is mitigated through encryption. Data is protected in transit from FBMS to BERT by SFTP. BERT authenticates to the FBMS server using public key infrastructure (PKI): BERT's public key is stored on the FBMS server, while BERT's private key is maintained on the BERT production server. Both BERT and FBMS use SSH host key fingerprints for verification/non-repudiation when establishing the connection. Data is protected in transit between the BERT web server and the end user by TLS.

The risk of unauthorized access is handled by a formal account provisioning process and by role-based access controls. BERT user accounts are provisioned only after government system owner approval. User accounts without recent activity are subject to semi-annual reviews and possible deactivation. Access to BERT data is restricted vertically by role and horizontally by organization or office. BERT roles are assigned based on the principle of least privilege.

Additionally, all BERT requests are audited, including username, date/time, URL, HTTP response code, and response time. Errors are logged with additional information.

The risk of improper destruction of records is mitigated by following Departmental and Office of the Secretary (OS) standard operating procedures for records destruction, which require review and authorization by the OS Records Management office before any records are purged/destroyed.

Section 4. PIA Risk Review

A. **Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

☒ Yes: BERT will use this information to accurately forecast payroll expenses for current and future budget fiscal years, as well as to perform cost trend analysis on prior years' data.

☐ No

B. **Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?**

☐ Yes

☒ No

BERT will be used to provide a complete picture of past and current budget execution and forecasting for future fiscal years. This allows offices to understand their payroll and benefits commitments when formulating annual budgets.

C. Will the new data be placed in the individual's record?

☐ Yes

☒ No

D. Can the system make determinations about individuals that would not be possible without the new data?

☐ Yes

☒ No

E. How will the new data be verified for relevance and accuracy?

Not applicable.

F. Are the data or the processes being consolidated?

☐ Yes, data is being consolidated.

☐ Yes, processes are being consolidated.

☒ No, data or processes are not being consolidated.

G. Who will have access to data in the system or electronic collection? Indicate all that apply.

☒ Users
☒ Contractors
☒ Developers
☒ System Administrator
☐ Other: *Describe*

BERT will be used by authorized budget staff and leadership within the Office of the Secretary. A small number of BERT users within the BIA budget office will also access BERT for the purposes of AS-IA budget reporting; their access is limited to AS-IA data.

The only contractors with access to BERT are those with valid contracts to provide BERT development or systems administration support, or contractors employed by the budget office and approved by government sponsors for BERT access.

H. How is user access to data determined? Will users have access to all data or will access be restricted?

An active DOI PIV account with LAN access is a pre-requisite for accessing BERT. BERT is accessible only within the DOI LAN. Authentication is performed through enterprise Active Directory BERT only performs authorization. BERT accounts are provisioned by the BERT development team after approval from the government system owner. This access control list is maintained in BERT. BERT data is restricted vertically by role as well as horizontally by organization or office. BERT roles are assigned based on the principle of least privilege.

I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?

☒ Yes.

BERT design/development/support tasks are contracted to Stargates. All Stargates employees involved with BERT are required to complete the same annual privacy and information security training as other DOI employees. The BERT contract includes standards of conduct protecting the security and privacy of government employees and data.

☐ No

J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

☐ Yes. *Explanation*

☒ No

K. Will this system provide the capability to identify, locate and monitor individuals?

☒ Yes.

Every BERT request is captured in real time in Internet Information Services (IIS) logs. A nightly job then parses the logs and stores the extracted data in Oracle tables for auditing and reporting purposes. IIS logs capture the individual's username, date/time of request, URL requested, HTTP response code, and response time. In addition, BERT captures any runtime errors in a separate application error log and emails the development team if an error occurs.

☐ No

L. What kinds of information are collected as a function of the monitoring of individuals?

BERT system logs capture the individual's username, date/time of request, URL requested, HTTP response code, and response time.

M. What controls will be used to prevent unauthorized monitoring?

BERT access controls are role-based and based on the principle of least privilege. Additionally, all BERT requests are audited in Internet Information Services (IIS) and IIS log files are parsed nightly for storage in BERT's internal Oracle database to facilitate audit reports.

N. How will the PII be secured?

(1) Physical Controls. Indicate all that apply.

☒ Security Guards
☐ Key Guards
☐ Locked File Cabinets
☒ Secured Facility
☐ Closed Circuit Television
☐ Cipher Locks
☒ Identification Badges
☐ Safes
☐ Combination Locks
☐ Locked Offices
☐ Other. *Describe*

(2) Technical Controls. Indicate all that apply.

☐ Password
☒ Firewall
☒ Encryption
☒ User Identification
☐ Biometrics
☒ Intrusion Detection System (IDS)
☐ Virtual Private Network (VPN)
☒ Public Key Infrastructure (PKI) Certificates
☒ Personal Identity Verification (PIV) Card
☐ Other. *Describe*

(3) Administrative Controls. Indicate all that apply.

☐ Periodic Security Audits
☒ Backups Secured Off-site
☐ Rules of Behavior
☒ Role-Based Training

☒ Regular Monitoring of Users' Security Practices
☒ Methods to Ensure Only Authorized Personnel Have Access to PII
☐ Encryption of Backups Containing Sensitive Data
☒ Mandatory Security, Privacy and Records Management Training
☐ Other. *Describe*

O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.

The BERT Information System Owner within the Office of the Secretary, Office of Budget is the official responsible for oversight and management of the BERT security and privacy controls, including the protection of the information processed and stored by the system.
The BERT Information System Owner and the Information System Security Officer are responsible for addressing privacy rights and complaints and ensuring adequate safeguards are implemented to protect individual privacy in compliance with Federal laws and policies for the data managed and stored in BERT in consultation with DOI Privacy Officials. Authorized budget staff, leadership with the Office of the Secretary, BERT users, contractors and administration support are all responsible for protecting the privacy rights of individuals. AS-IA is responsible for protecting the data they maintain and access.

P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?

The BERT Information System Owner is responsible for the daily operational oversight and management of BERT security and privacy controls, for ensuring to the greatest possible extent that data is properly managed and that access to the data has been granted in a secure and auditable manner. The BERT Information System Owner and Information System Security Officer are responsible for ensuring that any loss, compromise, or unauthorized access or disclosure of the PII is reported to DOI-CIRC and appropriate DOI officials in accordance with Federal policy and established DOI procedures. The BERT development team and the contractor are responsible for ensuring proper use and reporting any incidents related to BERT PII data.