

**Department of the Interior
Privacy Impact Assessment**

Name of Project: Trust Funds Accounting System (TFAS)
Bureau: Office of the Special Trustee for American Indians (OST)
Project's Unique ID: 010-90-01-05-01-9003-00

A. CONTACT INFORMATION:

5) Who is the Bureau/Office Privacy Act Officer

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any personal information about individuals?

a. Is this information identifiable to the individual?

Yes

b. Is the information about individual members of the public?

Yes

c. Is the information about employees?

Yes, possibly, since OST employees may also be beneficiaries.

2) What is the purpose of the system/application?

Trust Funds Accounting System (TFAS) is SEI Investment Inc.'s Trust 3000 commercial-off-the shelf (COTS) trust accounting system. TFAS is a fiduciary trust accounting system that does not have any functional interactions with any other government financial system.

The principal objective of this investment is to manage the collection, investment, and disbursement of monies held in trust for individual Indians and tribes. Currently, the system is accounting for approximately 3.47 billion dollars. TFAS is a private sector used and approved, trust accounting system. It is used to meet the Fiduciary Responsibilities set forth in the American Indian Trust Fund Management Reform Act of 1994 and to assist the Secretary of the Interior in meeting his fiduciary trust responsibilities as part of the DOI Strategic Goal of Serving Communities.

3) What legal authority authorizes the purchase or development of this system/application?

This effort is undertaken to comply with provisions set forth in the American Indian Trust Fund Management Reform Act of 1994 (Public Law 103-412).

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

Individual Indians, or their heirs, who are beneficiaries of trust assets managed by the Department of the Interior. This also includes Alaskan Natives and Indian Tribes.

2) What are the sources of the information in the system?

Data related to financial and investment activity from individual Indian beneficiaries and Tribes.

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

Individual account holders or Tribes are the source of the information.

b. What Federal agencies are providing data for use in the system?

Office of the Special Trustee for American Indians (OST), Bureau of Indian Affairs (BIA), Office of Historical Trust Accounting (OHTA), Minerals Management Service (MMS), Office of Hearings and Appeals (OHA), and other appropriate agencies in the Department of the Interior.

c. What Tribal, State and local agencies are providing data for use in the system?

In some instances, Tribes provide individual information for account setup. Nothing is provided by State and local agencies.

d. From what other third party sources will data be collected?

None

e. What information will be collected from the employee and the public?

1. Data includes information regarding financial transactions associated with Tribes, individual Indians and Alaskan Natives.
2. Trust revenue data consists of receipt information and investment amounts.
3. Trust disbursement data consists of payee information and payment amounts.

D. ATTRIBUTES OF THE DATA:

1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes

2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

No

3) Will the new data be placed in the individual's record?

No

4) Can the system make determinations about employees/public that would not be possible without the new data?

No

10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how can individuals grant consent?

Certain data elements are a necessary part of doing business; however, the SSN is not required and currently is voluntary. The information is not used for other than required or authorized uses.