Financial Management Service
Privacy Impact Assessment

Name of System: Regional Operation (RO) Payments Application
Project's Unique ID:

For purposes of completing any FMS PIA, "data" means any information on an individual in identifiable form, i.e., any information that can be used to identify an individual.

A. SYSTEM APPLICATION/GENERAL INFORMATION:

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

   Yes

   a. **Is this information identifiable to the individual[1]?**

   Yes

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

   Yes

   c. **Is the information about employees?**

   Yes

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

   The Financial Management Service (FMS), a bureau of the Department of the Treasury, is responsible for issuance of payments for most Federal Program Agencies (FPAs) of the Federal Government. Within FMS, these responsibilities are assigned to the Assistant Commissioner (AC) for Regional Operations (RO). The AC oversees the operations of four Regional Financial Centers (RFCs) that perform the actual payment disbursement.

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[1] "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

The information in RO Payments relates to payments made on behalf of these FPAs to individuals and business entities. In order for the RFC to issue payments on behalf of a FPA, detailed information for the payment inscription is required from the agencies. This detailed information includes payee name, a payment amount and address/destination.

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

31 USC 3325

B. DATA in the SYSTEM:

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

The individuals covered by the system are payees/recipients of US Government payments (e.g., Social Security Administration benefits, Internal Revenue Service Tax refunds, Federal salary, and VA Benefits, OPM Annuities, Railroad Retirement Annuities, Vendor and Miscellaneous payments etc.).

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

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?**

Federal Program Agencies (FPAs) provide all payment data; no data is obtained from the individual.

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

All FPAs for which FMS provides disbursing services (i.e., almost every Federal agency) submit data to RO Payments.

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

None.

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

None

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

RO Payments does not collect any information directly from taxpayers, employees, or other payees of Federal payments. All payment-related information is provided by the FPA requesting the payment to be made.

3) **Accuracy, Timeliness, and Reliability**

a. **How will data collected from sources other than FMS records be verified for accuracy?**

Payment data comes only from FPAs. Each FPA is responsible for the accuracy of the payment data submitted. FMS maintains no files as to entitlement for any recipient of a payment FMS issues at the request of a FPA.

b. **How will data be checked for completeness?**

FPAs certify data as complete and accurate. Proprietary RO disbursement software enforces file validation rules based on published formats, which include control records for total payment amount and number of items to be paid. These controls are compared against a certification supplied by the agency via the Secure Payment System.

c. **Is the data current?** What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

FPAs provide and certify the data received. FMS verify these two match.

d. **Are the data elements described in detail and documented?** If yes, what is the name of the document?

Yes, - Input File Specifications and Outgoing File Specifications

C. **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?

    Not applicable

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

    Not applicable

5) How will the new data be verified for relevance and accuracy?

    Not applicable

6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

    Not applicable

7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.

    Not applicable

8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

    The RO Payments application is mainly oriented toward the processing of batches of payments and not based on retrieval of individual payments. The system will provide limited retrieval based on Name, Account, TIN, SSN or bank routing number.

9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

    Not applicable

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 individuals can grant consent.)

    The RO Payments application does not collect any information directly from taxpayers, employees, or other payees of Federal payments. All payment-related information is provided by the FPA requesting the payment to be made and is required for accurate issuance of the payment.

D. **MAINTENANCE AND ADMINISTRATIVE CONTROLS:**

1) **If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

   The RO Payments application is designed to run at the primary computer site or the back up computer site. The same data is not run simultaneously at both sites, so data consistency is not an issue.

2) **What are the retention periods of data in this system?**

   With the exception of a subset of recurring SSA payments, details are maintained in the system long enough to recover processing, and support agency Disaster Recovery (DR) and Business Continuity Plan (BCP) needs. Summary information, audit information and logs are retained indefinitely.

   SSA recurring payment information is retained on an ongoing basis and is maintained with update information received from SSA.

3) **What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

   Disposition of data at the end of the retention period will be controlled by the system, returning the space to the operating system. The RO Payments application passes issue information to the PACER On-Line system for retention.

   Privacy information is not included in reports.

4) **Is the system using technologies in ways that the FMS has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

   No

5) **How does the use of this technology affect public/employee privacy?**

   Not applicable

6) **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

   No

7) **What kinds of information are collected as a function of the monitoring of individuals?**

Not applicable

8) **What controls will be used to prevent unauthorized monitoring?**

Access will be granted on a "need-to-know" basis. Users attend
mandatory annual privacy awareness and non-disclosure training sessions.
In addition, users are required to sign non-disclosure statements that
reference the Privacy Act. Periodic Supervisory Reviews will be
performed to ensure users are not performing unauthorized monitoring of
data. Reports and on-line displays will reference non disclosure of
Privacy Act information.

9) **Under which Privacy Act systems of records notice does the system
operate? Provide number and name.**

Treasury/FMS .002 – Payment Issue Records for Regular Recurring
Benefit Payments

Treasury/FMS .016 - Payment Issue Records for Other Than Regular
Recurring Benefit Payments

10) **If the system is being modified, will the Privacy Act system of records
notice require amendment or revision? Explain.**
Not applicable, replacement system will not require changes to the
existing systems of record.

E. **ACCESS TO DATA:**

1) **Who will have access to the data in the system?** (E.g., contractors, users,
managers, system administrators, developers, other)

Financial Management Service employees who serve as System
Administrators have access to all payment data in RO Payments. RO
Payments has a programmatically defined and controlled role for System
Administrators (i.e., System Administrators are considered RO Payments
users). All transactions are written to a permanent, unalterable audit log,
which include type of transaction, date/time, and user identification.

Application developers and operators have read access to RO Payments
data to provide timely support of the payments function.

Managers (other than RO Payments end users) do not have access to
production RO Payments data.

2) **How is access to the data by a user determined?** Are criteria, procedures,
controls, and responsibilities regarding access documented?

Some FMS users at Regional Financial Centers (RFC) can view payment data for all FPAs serviced by that RFC. All transactions will be written to a permanent, unalterable audit log, which will include type of transaction, date/time, and user identification.

Criteria and controls are contained in RO Payments System Security Plan.

3) **Will users have access to all data on the system or will the user's access be restricted? Explain.**

User access is defined and controlled by role based security. Users are assigned access for the level of access needed to perform job duties based on the defined roles.

System Administrators have access to all data files in RO Payments. All transactions will be written to a permanent, unalterable audit log, which will include type of transaction, date/time, and user identification.

Application developers and operators have read access to RO Payments data to provide timely support of the payments function.

Managers (other than RO Payments end users) do not have access to production RO Payments data. Procedures and responsibilities will be contained in RO Payments Rules of Behavior.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?** (Please list processes and training materials)

See #1 and #2 above

5) **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system**? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

No. There are no contractors are involved in design or development of the RO Payments Application.

6) **Do other systems share data or have access to the data in the system? If yes, explain.**

No. The system will push data to interfacing systems. No interfacing systems access data in RO Payments.

7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

   The RO Payments Business Owner (AC, RO)
   The FMS Chief Information Officer – Platform (General Support System)

8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?

   No

9) How will the data be used by the other agency?

   Not applicable

10) Who is responsible for assuring proper use of the data?

   Not Applicable