

## **Financial Management Service Privacy Impact Assessment**

**Name of Project:** Transaction Reporting System

**Project's Unique ID:** 015-10-01-14-01-1230-00

### **A. SYSTEM APPLICATION/GENERAL INFORMATION:**

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

##### **a. Is this information identifiable to the individual<sup>1</sup>?**

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

Potentially, yes. The Sending Trading Partner (STP) has the potential to send individually identifiable information.

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

(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

Potentially, yes. The STP has the potential to send individually identifiable information about members of the public.

##### **c. Is the information about employees? (If yes and there is no information about members of the public, the PIA is required for the FMS IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).**

Potentially, yes. The STP has the potential to send individually identifiable information about employees, but only as they are members of the public.

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

TRS will be an FMS-wide transaction broker, data warehouse and reporting solution that will provide Trading Partners and FMS with a single touch point

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<sup>1</sup> "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).

for the exchange of all financial transaction information across all collection systems. This will enable FMS to normalize financial transaction reporting and standardize the availability of funds and financial information across all settlement mechanisms and collection systems. TRS will greatly improve the way government agencies collect, analyze and redistribute financial transaction information, which, in turn, will eliminate redundancies and disconnects across and between the numerous point-to-point connections currently in place between collection agents and Federal agencies.

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

The Secretary of the Treasury has authority to designate financial institutions as depositaries and financial agents of the United States to perform essential banking services pursuant to 12 United States Code (U.S.C.) 90 and 265, 31 U.S.C. 3303, and other authorities.

The Secretary of the Treasury has delegated to FMS the authority to select and designate depositaries and financial agents for, among other purposes, providing TRS and related services.

**B. DATA in the SYSTEM:**

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

Individuals and organizations who make payments to Government agencies.

**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?**

Information is not received from individuals. The source of the information is the STP. STPs are entities that provide government information into TRS.

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

None. Federal agencies are not providing data for use in the TRS system.

**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?**

None. TRS is receiving information from the STP.

There are some data elements that are explicitly defined in the system, and may be provided by an STP, if available. Specifically, these data elements are defined as a payee's and/or payer's bank information such as bank account number, routing transit number, and check number; and, a payee's and/or payer's Account information such as address, city, state and postal code.

User-defined data fields are available to be populated by the STP, but are not explicitly defined in the system. The user-defined data fields are free-form, and may potentially be populated with personally identifiable information (PII).

For details on the potential types of data and the possibility of PII being added to the user-defined data fields, refer to the PIA for each individual STP.

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

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

The STP will verify the accuracy of all data collected from sources other than FMS records before transmitting the data to TRS.

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

The STP will verify the completeness of all data before the data is sent to TRS.

**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).**

The currency of the data is determined by the STP.

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

Yes.

Data elements that are sent to TRS by the STP are documented in the Interface Specification that is created for each STP.

### **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?**

All of the data collected by TRS is relevant and necessary for the system purpose in Section A. 2, above.

- 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 (N/A)

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

N/A

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

N/A

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

TRS has flexible access control through the use of data type and data value data permissions which protect data from unauthorized access or use.

Every user is a member of an access group and is limited to no more than the roles, files, and trading partner data in that access group.

Data access control has been implemented in TRS in compliance with the principles of “separation of duties” and “least privilege.”

TRS follows all NIST, Treasury, and FMS security policies, procedures, and standards for access control.

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

Processes are not consolidated.

- 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.**

No. Data is not retrievable by personal identifiers.

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

No reports can be produced on individuals.

- 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.)**

TRS does not work directly with individuals. Each STP has the opportunity to decline to send information to TRS.

#### **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?**

In the event of a primary site failure, TRS production will be relocated to the back-up site. Data replication of the application and the database ensures the consistent use of the system and data. In the face of such an event or

interruption, the IT infrastructure and related business support systems would be activated at the alternate recovery site to provide a consistent processing platform and infrastructure for STPs.

Data recovery exercises are conducted on a regular basis to ensure that the system recovery process is functioning properly.

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

Up to 1 year for transmission files from STP depending upon the retention parameter in the file profile.

**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?**

No FMS records can be destroyed unless authorized under National Archives and Records Administration-approved retention schedules and approved for destruction, in writing, by FMS Chief Counsel.

Procedures are documented in the TRS Record Retention Policy.

**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?**

N/A

**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?**

N/A

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

N/A

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

Treasury/FMS.017 – “Revenue Collections Records”

**10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.**

No

**E. ACCESS TO DATA:**

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

STP Users, OPS Users, FMS Users and Agency Users.

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

User access is based on access group, role, file, and trading partner profile data permissions on User Setup Worksheets signed by Access Group Managers.

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

A user’s access is constrained by the access group, role(s), file(s), and trading partner profile data permissions specified on their User Setup Worksheet.

**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)

Software is in place to control access to data in the system. Before gaining access to the system, and annually thereafter, all users are required to read and agree to the TRS Rules of Behavior.

- 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?**

Yes.

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

US Treasury and Agency-operated systems may receive data residing in TRS.

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

It is the responsibility of FMS and its financial agent.

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

Yes. Other Federal agencies will have access to the data in the system.

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

Data usage will be determined by FMS and the Federal Agency requiring the data.

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

The TRS System Owner