

## Privacy Impact Assessment

**Name of Project: Go Direct**

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

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

Yes

**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? No**

**2) What is the purpose of the system/application?** To capture Federal benefit direct deposit enrollment information and process to the appropriate paying Agency.

**3) What legal authority authorizes the purchase or development of this system/application?** Debt Collection Improvement Act of 1996.

### **B. DATA in the SYSTEM:**

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

Federal benefit recipients or their legal representatives

Federal Reserve Bank Users (Operations)

Organizational Representative Payee Users (Nursing Homes)

**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?**

The Individual or their legal representative and FMS

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

FMS.

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

N/A

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

N/A

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

*For Employees: N/A*

*For the Public:*

**For Enrollments:**

Name of Federal benefit recipient  
Name of legal representative  
Mailing Address  
Phone number  
Social Security Number  
Type of Payment  
Bank account number  
Bank routing number  
Type of bank account  
Check Number or Claim Number  
Last Federal Payment  
Email address (for enrollments on internet)

**For Corporate User Registration:**

Corporation Name  
Name of Representative  
Title of Representative  
Contact information

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

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

For enrollments, an enrollment (ENR) file will be sent via ACH to the paying agency to verify the data and setup the Federal benefit recipient for direct deposit. We also verify the information back to the customer (for phone enrollments) and re-enter the SSN and Bank account number.

For Corporate user registration, controls focused on contacting the corporate entity to validate the information provided will be implemented.

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

The system will require that all necessary fields are entered.

**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).**

Data collected will be compared to data in FMS.

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

The data elements are consistent with those used to complete FMS Form 1200.

**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?**

Yes

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

Yes

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

For Enrollments, FMS will be used to verify check number or claim number, and amount of latest Federal payment (within a \$5 threshold).

For Corporate users, FMS will require a legal agreement be signed and all user information (i.e. logon/password) will be kept and maintained based on Federal Reserve system and FMS system security standards.

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

Limited electronic access secured by logonid and password. Limited physical access secured by badge access.

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

N/A

- 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.**

Data retrieval is only available for FRB staff. Individual data records may be retrieved using the following fields:

- Name

- Phone number
- Social Security 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?**

All reports are produced at a summary level. No reports are generated that list individual data.

Corporate Users will be able to produce payment reconciliation reports. This will be limited to registered corporate users.

**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.)**

Enrollment in Direct Deposit through Go Direct is a voluntary program. Enrollees are presented with privacy act language stating that they don't have to give their information, but if they don't then Go Direct cannot process the enrollment.

**E. 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?**

N/A

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

Per the Go Direct Systems of Record Notice, published in the Federal Register, Go Direct uses a 6-month retention period.

**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?**

Retention follows the FMS Records Retention Manual, N1-425-91-1

**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.**

The Go Direct Systems of Records Notice, 70 FR 59395

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

Not anticipated

**F. ACCESS TO DATA:**

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

- FRB users and management
- Registered Corporate Users who have access to their specific data for payment reconciliation purposes.

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

All access requests are reviewed and approved by authorized personnel.

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

Access is restricted by user groups and based on role and organization (i.e. FRB operational user access differs from a registered Corporate user).

**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)

Federal Reserve users must pass a financial and criminal background check before being hired and are required to take security awareness training on an annual basis. Corporate users can only view information about individuals they have enrolled, and must use a login and password to view that information

- 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. Privacy Act contract clauses are inserted into the contracts.
- 6) **Do other systems share data or have access to the data in the system? If yes, explain.**  
Yes, the ACH system is utilized to transport the enrollment requests to the paying agency.
- 7) **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**  
The Federal Reserve Bank
- 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?**  
N/A
- 10) **Who is responsible for assuring proper use of the data?**  
If this question is related to 6 & 7, the answer is N/A. If it's related to question 8 & 9, the answer is the Federal Reserve System.