

**Financial Management Service (FMS)**  
**Privacy Impact Assessment**

**Name of Project:** Treasury Offset Program (TOP)/Call Tracking System (CTS)

**Project's Unique ID:** TOP/CTS

**A. SYSTEM APPLICATION/GENERAL INFORMATION**

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

Yes

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

TOP is a centralized, interactive database of delinquent debts also known as the National Interactive Delinquent Debtor Database which allows for identification of delinquent debtors who are receiving Federal payments. Payments certified by Federal payment agencies are compared to the interactive database; and, where a match is identified, an offset may occur reducing or eliminating the existing debt. Funds received due to an offset are provided by FMS to the agency that established the debt.

CTS is a interactive database that tracks calls to BDMOC from delinquent debtors inquiring about their delinquent debt.

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

The Debt Collection Improvement Act (DCIA) of 1996 (public Law 104-134).

**B. DATA in the SYSTEM:**

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

Federal and state delinquent debtors

**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?**

In TOP, debt and debtor information is provided by the Federal and state agencies participating in TOP.

In CTS the information is input by the customer service representative answering the call.

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

The Federal agencies participating in TOP are the following:

Office of Child Support Enforcement  
Department of Health & Human Services  
Veterans Administration  
Department of Education  
Small Business Administration  
Department of Housing & Urban Development  
USDA - Rural Development  
U.S. Department of Justice  
Bureau of Public Debt  
DOT - Office of the Secretary  
Defense Finance & Accounting Service  
Federal Energy Regulatory Commission  
Army/Air Force Exchange Service  
U.S. Consumer Product Safety Commission  
Navy Exchange  
Office of Personnel Management  
U.S. Peace Corps  
U.S. Department of Energy  
Railroad Retirement Board  
Department of Interior - National Park Service  
U.S. Department of State  
DOT - Office of the Secretary  
Federal Emergency Management Agency  
United States Customs  
Social Security Administration  
Food & Nutrition Service  
DOC - Patent & Trademark Office  
U.S. Secret Service  
National Science Foundation  
U.S. Department of Commerce  
FMS – DMSC  
Environmental Protection Agency  
General Services Administration  
HHS - Health Care Financing Administration  
Agency for International Development

Smithsonian Institution  
Bureau of Alcohol, Tobacco, Tax & Trade  
U.S. Department of Labor  
U.S. Postal Service  
National Credit Union Administration  
DOL - Employment Standards Administration  
USDA - Animal Plant Health Inspection Service  
Central Intelligence Agency  
Farm Services Agency  
USDA - National Finance Center  
USDA - Risk Management Agency  
Federal Communications Commission  
DOT - Comptroller of the Currency  
Internal Revenue Service  
DOT - Office of Thrift Supervision  
DOT - U.S. Mint  
Federal Law Enforcement Training Center  
National Labor Relations Board  
Federal Maritime Commission  
Inter-American Foundation  
Equal Employment Opportunity Commission  
Security Exchange Commission  
Pension Benefit Guaranty Corp.  
U.S. Information Agency  
Marine Corps Exchange  
AFRH - U.S. Navel Home  
Architect of the Capitol  
Federal Housing Finance Board  
Commodity Futures Trading Commission  
General Accounting Office  
U.S. Nuclear Regulatory Commission  
DHHS - Centers for Disease Control & Prevention  
DHHS - Food & Drug Administration  
DHHS - National Institute of Health  
DOJ - Justice Management Division  
DOJ - Bureau of Prisons  
DOJ Drug Enforcement Administration  
NASA Headquarters  
Corporation for National Service  
DOJ - Federal Bureau of Investigation  
Air Force Service Agency  
Army/Air Force Exchange Service  
DOI - U.S. Geological Survey  
DOI - Bureau of Reclamation  
Department of the Interior

DOI - Bureau of Land Management  
DOI - U.S. Fish & Wildlife Service  
Bureau of Indian Affairs  
DOI - Office of Trust Fund Management  
Immigration & Naturalization Services  
AFRH - U.S. Soldier's & Airmen's Home  
International Boundary & Water Commission  
DOT - Bureau of Transportation Statistics  
DOT - Federal Aviation Administration  
DOT - Federal Highway Administration  
DOT - Federal Railroad Administration  
DOT - Federal Transit Administration  
DOT - Maritime Administration  
DOT - National Highway Traffic Safety Administration  
DOT - Volpe National Transportation  
DOT - Surface Transportation Board  
DHS - U.S. Coast Guard  
FMS - Reclamations  
Navy Personnel Command  
Debt  
Department of Homeland Security  
Transportation Security Administration  
U.S. Army Corps of Engineers  
U.S. House of Representatives  
International Broadcasting Bureau  
National Endowment for the Arts  
American Battle Monuments Commission  
Overseas Private Investment Corporation  
Department of Health & Human Services  
Federal Mediation and Conciliation Service  
Federal Election Commission  
United States Tax Court  
Administrative Offices of the U.S. Courts  
DOT - Federal Motor Carriers Safety Administration  
Farm Credit Administration  
National Transportation Safety Board  
Occupational Safety & Health Review Commission  
Bureau of Engraving & Printing  
Valles Caldera Trust  
Office of Surface Mining  
DOJ - U.S. Marshals Service  
Federal Labor Relations Authority  
U.S. International Trade Commission  
Appalachian Regional Commission  
U.S. Holocaust Memorial Museum

Executive Office of the President  
Selective Service System  
Defense Threat Reduction  
Financial Management Service  
National Mediation Board  
National Capital Planning Commission  
U.S. Chemical Safety and Hazard Investigation Board  
U.S. Office of Government Ethics  
Court of Appeals for Veterans Claims  
Merit System Protection Board  
Federal Mine Safety  
Export Import Bank of the United States  
Presidio Trust  
Denali Commission  
Millennium Challenge Corporation  
Department of Immigration Health Services  
U.S. Commission on Civil Rights  
National Security Education Program  
United States Capitol Police

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

The state agencies participating in TOP are the following:

AL Alabama Department of Revenue  
AR Arkansas Department of Revenue  
AZ Arizona Department of Revenue  
CA California Department of Revenue  
CO Colorado Department of Revenue  
DC District of Columbia Department of Revenue  
DE Delaware Department of Revenue  
GA Georgia Department of Revenue  
HI Hawaii Department of Revenue  
ID Idaho Department of Revenue  
IA Iowa Department of Revenue  
IL Illinois Department of Revenue  
IN Indiana Department of Revenue  
KS Kansas Department of Revenue  
KY Kentucky Department of Revenue  
LA Louisiana Department of Revenue  
MA Massachusetts Department of Revenue  
MD Maryland Department of Revenue  
ME Maine Department of Revenue  
MN Minnesota Department of Revenue  
MO Missouri Department of Revenue

MT	Montana Department of Revenue
NC	North Carolina Department of Revenue
NE	Nebraska Department of Revenue
NJ	New Jersey Department of Revenue
NM	New Mexico Department of Revenue
NY	New York Department of Revenue
OH	Ohio Department of Revenue
OK	Oklahoma Department of Revenue
OR	Oregon Department of Revenue
PA	Pennsylvania Department of Revenue
PF	Philadelphia Financial Center
RI	Rhode Island Department of Revenue
SC	South Carolina Department of Revenue
UT	Utah Department of Revenue
VA	Virginia Department of Revenue
VT	Vermont Department of Revenue
WI	Wisconsin Department of Revenue
WV	West Virginia Department of Revenue

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

The TOP application receives data from numerous government agencies and provides data to other internal systems. TOP does not connect to systems external to FMS nor does CTS.

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

No information will be collected from the employee and the public for use in TOP. When a debtor calls into BDMOC, the debtor enters his TIN for verification and to help identify the debt for CTS.

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

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

Agencies are required to submit a certification agreement certifying all debts transmitted by the creditor agency to TOP for collection. The certification agreement covers all debts including updates, changes, and modifications submitted on or after the date of the certification agreement. The agreement certifies that the debts are valid and legally enforceable.

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

Each participating agency is responsible for certifying and validating the data submitted to TOP.

- 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).**

TOP is updated weekly via batch transmission or daily using the TOP Client by the creditor agencies with current information.

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

Yes, in the security plan.

**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?**

NA

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

NA

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

NA

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

NA

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

NA

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 TOP user will enter a social security number (SSN)/employer identification number (EIN), or debt number to retrieve debt and debtor information.

The debtor provides CTS with an SSN, EIN, or debt number for verification of identity and to retrieve debt and debtor information.

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

The following are reports that can be produced on individuals through TOP:

<b>Report</b>	<b>Description</b>	<b>Access</b>
Individual Inquiry by TIN, Creditor Agency View	Lists offset and reversal activity for a specified TIN.	Creditor Manager Creditor Staff Creditor View
Individual Inquiry by Debt Number, Creditor Agency View	Lists offset and reversal activity for a specified Debt Number.	Creditor Manager Creditor Staff Creditor View
Individual Inquiry by TIN, Payment Agency View	Lists offset activity for a specified TIN.	Payment Staff
Debtor Locator, Creditor Agency Only	Lists detailed debtor locator information by creditor ALC.	Creditor Manager Creditor Staff Creditor View

No reports are generated by CTS.

**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 systems are only operated in one site.



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

Currently there are no retention guidelines in place. The data is retained indefinitely.

**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?**

Currently there are no retention guidelines in place. The data is retained indefinitely and stored in the TOP database and the CTS information is maintained in its own database.

**4) Is the system using technologies in ways that 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?**

NA

**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?**

NA

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

NA

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

System of Records Notice FMS .014 – Debt Collection Operations System

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

N/A

**E. ACCESS TO DATA:**

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

Access to the data in TOP is by external Federal program agencies, external state agencies, and internal FMS employees for the system.

Access to the data in CTS is by internal FMS employees at BDMOC.

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

All users are restricted to only the functions they need for the performance of their duties. For example, regular users cannot access the system audit logs. User level of access is authorized and reviewed regularly to ensure that user access does not exceed position requirements for all systems and applications. Risk levels are associated with job descriptions to determine access levels for the TOP application. Managerial approval is required before a user is granted access to functions within the TOP application.

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

TOP users are restricted to only the functions they need for the performance of their duties.

Only a limited number of individuals associated with TOP have the highest level of access. Access rights are reviewed for continuing need at each level.

- 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.)**

TOP/CTS application management is committed to supporting least privilege and logical access control. TOP/CTS application users are restricted to only the functions they need for the performance of their duties. Access rights are reviewed periodically to appropriate levels. In addition, TOP/CTS users must consent to the disclosure agreement displayed when logged on before they can proceed to the main menu. TOP/CTS users also must sign and submit the TOP/CTS Rules of Behavior to prevent unauthorized monitoring.

- 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?**

TOP – No

CTS – Yes. Privacy Act contract clauses are inserted into their contracts, and they are required to take FMS IT security training and disclosure training annually.

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

TOP shares data with other FMS systems. Interface agreements among these systems are not necessary since they operate within the FMS-controlled security environment. The systems with which TOP shares data are listed here:

Debt Check receives an extract of the TOP database.

TCS receives and sends TOP data.

DMAS receives TOP data.

CTS does not share information nor do any other systems have access to the data within CTS.

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

FMS, information owners, and system managers will be responsible for protecting the privacy rights of the individuals affected by the interface.

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

Federal and state government employees working for agencies that have referred their outstanding debts to TOP will have access to their specific agency data in TOP.

CTS does not share information with other agencies.

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

TOP information is provided to authorized Federal and state agencies for the purpose of collecting delinquent debt. The TOP system allows the identification of delinquent debtors who are receiving Federal payments. Payments certified by Federal payment agencies are compared to the interactive database: and where a match is identified, an offset may occur reducing or eliminating the existing debt. Funds received due to an offset are provided by FMS to the agency that established the debt.

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

The FMS bureau head and TOP/CTS business owner are responsible for the proper use of TOP data by their employees.