

Financial Management Service

Privacy Impact Assessment

Name of Project: PACER

Project's Unique ID:

A. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

Yes

a. Is this information identifiable to the individual¹?

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?

PACER On-Line (POL) functions as an on-line shared database that supports the Financial Management Service Regional Financial Centers' (RFC) accounting and claim processes. The application provides daily check reconciliation, daily electronic fund transfer reconciliation, daily accounting balancing and cancellation information. *POL on-line functions include:* Inquire on payment information, Submit claim requests, Request, display, print check images, Submit and retrieve accounting information. *POL batch functions include processing:* Claim requests files, Accounting files, Electronic fund transfer returns files, Check return files, Payment data files. *POL reports and forms include:* Daily check reconciliation, Daily electronic fund transfer reconciliation, Daily accounting balancing and Cancellation information.

PACER houses all payment data received from the RFCs. Current back to 1997.

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).

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), which includes employees.

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

RFCs provide all payment data.

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?

Data comes directly from RFCs.

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.

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

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 RFCs. Each RFC is responsible for the accuracy of the payment data submitted. PACER receives Check detail and Status changes from TCIS. 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?

Other than enforcing file format edits, FMS does not and cannot check the data for completeness.

c. Is the data current?

Yes, PACER receives payment information files daily from the Regional Financial Centers with current data. PACER compares the check ranges to ensure all data is in sync. Reports are generated if any data is missing.

d. Are the data elements described in detail and documented?

Yes – CPSS file format for OPTIDISK and TCIS status file.

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?

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?**

N/A

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

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.**

PACER maintains all payment data disbursed by FMS back to October 1997. Payment data can be retrieved from the Pacer database by a payment identifier of the payee or at the individual payment detail level, check or eft.

- 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 payment data is collected at the detail level, however the system is not designed to generate reports on the payment data of individuals. By accessing PACER on-line an authorized user can view individual payment records back to 1997. Access is restricted by FPA (i.e., a user can only view data for the Agency Location Code(s) for which they are authorized).

- 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.)**

N/A – All data is passed directly from the RFCs to PACER.

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?**

PACER runs on only one platform. All users run the same version of the application. FMS configuration management procedures permit only one version to be in production at any given time.

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

Data is retained in PACER from October 1997 to current, where it is maintained 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?

As indicated above, all payment data in PACER is maintained indefinitely.

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

N/A

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.

FMS has published two Privacy Act system of record notices for its payment records – Treasury/FMS .002, Payment Issue Records for Regular Recurring Benefits, and Treasury/FMS .016 Payment Issue Records for Other Than Regular Recurring Benefits.

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)

U.S. Treasury Financial Management Service and employees and contractors who serve as database administrators and system administrators have access to all payment data in PACER. FPA employees are restricted to viewing and processing data only for their own agency.

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

Each FPA end user is programmatically restricted to view and process data only for his/her own agency (actually, at the Agency Location Code (ALC) level). Access is strictly on a need to know basis. All users at a given FPA can view all payment data for that FPA. FMS users at Regional Financial Centers (RFC) can view payment data for all FPAs serviced by that RFC.

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

POL 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 to ensure that the user access does not exceed position requirements.

External POL Application users are further restricted to only see the data that they have issued. Therefore, Social Security Administration user can not see Internal Revenue Service data.

Criteria and controls are contained in PACER documentation. Procedures and responsibilities are contained in user manuals and PACER Rules of Behavior. These Rules of Behavior must be accepted once again or the user can't access PACER.

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)

- The principle of least privilege is applied restricting access for need-to know

- FMS limits the number of login attempts by a user during 30 minutes to three
- Access enforcement includes individual accountability and audit trails where passwords are associated with a userID that is assigned to a single individual
- Access Control Lists are reviewed regularly to identify and remove users who have left the organization or whose duties no longer require access to the application. The regularity depends on the type of user. POL has monthly, quarterly, semi-annually and annually recertification of users and reviews. Daily notifications are sent out for action when an access needs to be removed.

In addition, all legitimate users must access PACER using their assigned Logon ID. All PACER users must be added to Staff user tables by a System Administrator. As explained previously, FPAs are responsible for determining all entitlement to payments they certify. Therefore, PACER grants all users from a given FPA (ALC) access to data for that ALC.

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, standard Privacy Act clauses are included in the contract.

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

POL is not directly interconnected with systems at agencies external to FMS and it does not share its database with external agencies. Although it receives and passes data files to and from other FMS systems, POL does not share a database with other internal FMS systems.

The PACER On-line Application interfaces with the following applications, utilities, and files:

- GWA Government Wide Accounting Financial Organization Master File (FOMF)
- RO Payments Payment Optical Disc Storage and Retrieval System (PODSARS).
- IR - Treasury Check Information System (TCIS).

PACER payment data is available to on-line users. Access to the FMS payment system is limited to authorized FMS RFC personnel. Access to the permanent issue record is restricted to authorized FMS and FPA personnel. FPA personnel are programmatically restricted to data at the ALC level. PACER allows the TCIS system the ability to read PACER data for viewing.

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

The FMS Business Owner

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

RFCs submit data to PACER. Each FPA has access to its own data. No International, State, Local, or Other agency shares data or has access to it.

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

N/A

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

The PACER Business Owner