Privacy Impact Assessment

for the

Tracking Assistance for the Legal Office Network

Certifications:

Acting Chief Information Officer

U.S. Department of Justice

Executive Office for United States Attorneys

I certify that this Privacy Impact Assessment conforms to the principles of OMB Memorandum M-03-22, and that the assessed system is in compliance with Section 208 of the E-Government Act of 2002 (Pub. L. 107-347).

/signed/ 5/31/2006 Joe Welsh Date Program Manager, Tracking Assistance for the Legal Office Network **Executive Office for United States Attorneys** U.S. Department of Justice /signed/ 5/31/2006 Siobhan Sperin Date System Owner, Tracking Assistance for the Legal Office Network Assistant Director, Case Management Staff **Executive Office for United States Attorneys** U.S. Department of Justice /signed/ 5/31/2006 William G. Stewart, II Date Acting Assistant Director, Freedom of Information & Privacy Staff **Executive Office for United States Attorneys** U.S. Department of Justice /signed/ 6/1/2006 David W. Downs Date

System Description: The Tracking Assistance for the Legal Office Network (TALON) system is a case tracking application used by the United States Attorneys Offices (USAOs) that allows offices to track all cases where money is owed to the government, e.g., fines imposed by the court, mortgage, foreclosures, defaulted student loans.

TALON is currently operational.

System Purpose: TALON serves as the debt tracking and collection system for the Financial Litigation Units of the USAOs. High-level application functions include generation of litigation documents and debtor correspondence, financial calculations to track the payments on a debt as well as maintain a current balance, generation of billing statements for debtors, identification of debtors to be enrolled in the Treasury Offset Program, and generation of national reports for inclusions in statistical findings for Congress. In the course of serving this purpose, the TALON system must collect and maintain certain personal information which identifies federal debtors.

Assessment:

1. What information is to be collected?

A clear relationship has been established between the personal information to be collected and the TALON system operational requirements. The personal information to be collected is pertinent to the stated TALON system purpose and only information that is required is collected. The personal information to be collected and maintained by TALON system is an individual's full name, social security number, address, and date of birth.

2. Why is the information being collected?

The TALON system collects personal information to track and correspond with debtors, as well as to locate and collect additional debtor assets.

3. What is the intended use of the information?

The personal information is necessary to properly track and collect fines and other debts owed to the United States government.

4. With whom will the information be shared?

The personal information will be shared only with cleared and authorized users having a legitimate need to know.

5. What opportunities will individuals have to decline to provide information or to consent to particular uses of the information, and how individuals can grant consent?

As the personal information is required for litigation, individuals have no opportunity to decline to provide or consent to particular uses of the information.

6. How will the information be secured?

The information is secured with management, operational, and technical controls as delineated by NIST Special Publication 800-53 *Recommended Security Controls for Federal Information Systems*. The applied system category control set is **moderate** as defined by NIST Special Publication 800-60 *Guide for Mapping Types of Information and Information Systems to Security Categories*. The system is certified and accredited for control compliance as well as adherence to industry security best practices and mitigation of risk due to technical vulnerabilities.

The potential risk for unauthorized disclosure of personal information is mitigated by

- limiting the number of authorized system users,
- performing background investigations on candidate users,
- providing initial and annual system security training,
- vetting Freedom of Information Act (FOIA) requests,
- limiting physical access to the system, and
- monitoring network activity with a continuously monitored intrusion detection System

7. Is the system of records being created under the Privacy Act, 5 U.S.C. 552a?

Yes. The information collected and maintained by TALON system is governed by the Privacy Act. The information may be disclosed without the individual's consent, but only as permitted by the Privacy Act, the Freedom of Information Act, and in accordance with established TALON system policy and procedure.