

# **Government Agency Investment Services System Privacy Impact Assessment (PIA)**

**July 21, 2008**

**Department of the Treasury  
Bureau of the Public Debt  
Office of Public Debt Accounting  
Parkersburg, WV 26106**



## **System Information**

### **Name of System, Project or Program:**

Government Agency Investment Services System (GAISS)

**OMB Unique Identifier:** 015-35-01-01-01-1007-00

## **Contact Information**

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**System Application/General Information****1. Does this system contain any information in identifiable form?**

Yes. Although the majority of the GAISS components do not contain personal identifiable information (PII), the component used to administer the Federal Housing Administration (FHA) Debenture program contains PII.

## 2. What is the purpose of the system/application?

GAISS enables The Bureau of the Public Debt (BPD) to effectively and efficiently administer various programs in support of its mission. These programs include:

**Federal Investments program –**

Issues Government Account Series (GAS) securities in book entry form to Federal Investment accounts, and maintains the detailed record of holdings, activity and earnings of each investment account.

**Trust Funds Management program–**

Public Debt is the servicing agent responsible for processing certain receipt, investment, investment servicing, disbursement, and redemption transactions for certain Treasury-managed trust funds.

**Federal Housing Administration (FHA) Debenture program –**

Transactions include book entry loan transactions and payment information to the public.

**Depository Compensations Securities (DCS) program –**

Securities held to compensate banks for services rendered to U.S. Department of the Treasury (Treasury). Transactions include book entry loan transactions and payment information to the public. Currently, there are no outstanding securities for this program.

**Federal Borrowing program –**

Transactions include borrowings, repayments and related interest on loans between the Treasury and other federal agencies.

**Special Purpose Securities program –**

Transactions include issuance, account maintenance, payments and reporting for Special Purpose securities [State & Local Government Series (SLGS) Time and Demand Deposit securities, Domestic Series (Refcorp) Time and Demand Deposit securities, 5% Rural Electrification Authority (REA) securities, and U.S. Mortgage Guaranty Insurance Company Tax and Loss Securities].

## 3. What legal authority authorizes the purchase or development of this system/application?

5 U.S.C.301; 31 U.S.C. 3101, *et seq.*

**4. Under which Privacy Act SORN does the system operate? (Provide the system name and unique system identifier.)**

BPD .003--United States Securities (Other than Savings-Type Securities)

**Data in the System**

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

Investment accountants, general public, other federal 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?**

In regards to the FHA Debenture program, the information source can be an individual or the Federal Housing Administration. If a borrower defaults on one of these loans, the Federal government has the option to issue a FHA debenture to cover the defaulted mortgage loan. These FHA debentures are tradable and, thus, may be held by an individual.

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

Public Debt, The Department of Housing and Urban Development (HUD), The Federal Housing Administration, Financial Management Service (FMS), and The Resolution Funding Corporation (Refcorp).

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

Multiple states and local agencies provide data for the Special Purpose Securities System and SLGSafe components of GAISS. State and local agencies do not provide input in the Invest One Mainframe Accounting Engine component (where the FHA debenture account information is housed).

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

Data will not be collected from third party sources.

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

- Account Name
- Account Address
- Social Security Number
- Tax Identification Number
- Contact Person
- Telephone Number
- ABA Routing Number
- Financial Institution Name
- Bank Account Name
- Bank Account Number
- Bank Account Type

**3. Accuracy, Timelines, and Reliability****a. How will data collected from sources other than bureau records be verified for accuracy?**

Public Debt has implemented suitable system, personnel and physical security measures to adequately protect the integrity and security of this information.

GAISS has a multiple automated system edits and input controls to prevent users from initiating erroneous and/or unauthorized transactions. New edits introduced to the system and existing edits are thoroughly tested prior to deployment. Management controls supplement logical and physical protections by requiring regular and frequent review of audit trails, audit logs, and access violation reports. Public Debt's computing infrastructure is subject to frequent independent audits and regular security reviews.

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

Through verifications and reconciliation OPDA accountants/analysis check system data for accuracy and completeness. BPD also provides various reports to HUD at each month end that provide a financial summary of the FHA Debentures program to assist HUD in verifying the accuracy and completeness of the data.

In addition, GAISS has a multiple automated system edits and input controls to prevent users from initiating erroneous and/or unauthorized transactions. New edits introduced to the system and existing edits are thoroughly tested prior to deployment. Management controls supplement logical and physical protections by requiring regular and frequent review of audit trails, audit logs, and access violation reports. Public Debt's computing infrastructure is subject to frequent independent audits and regular security reviews.

- 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.)**

Yes, the GAISS data is current. OPDA accountants/analysis monitor data inputs and perform daily reconciliations to ensure the data is current and accurate. Reference Special Investments Branch (SIB) FHA procedures and documentation.

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

Yes, the data elements are described in detail and documented in the SIB FHA procedures and documentation.

### **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, information in this system is collected and maintained to enable Public Debt to process transactions, to make payments, and to identify owners and their accounts.

- 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?**

The system will not derive new data or create previously unavailable data about an individual.

- 3. Will the new data be placed in the individual's record?**

There will be no new data created.

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

There will be no new data created.

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

There will be no new data created.

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

The data will not be consolidated.

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

The data will not be 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.**

Yes, personal identifiers can be used to retrieve data. PII identifiers that can be used are:

- Social Security Number
- Tax Identification 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?**

Currently there is only one individual invested in the FHA Debenture program. Financial reports can be produced on this individual to provide account information, perform verifications and process payments. Access is granted to the individual, BPD, HUD, and IRS.

## **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 system will not be operated in multiple sites.

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

Records of holdings, forms, documents and other legal papers which constitute the basis for transactions subsequent to original issue are maintained for such time as is necessary to protect the legal rights and interests of the United States Government and the person affected, or otherwise until they are no longer historically significant.



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**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?**

Other records are disposed of at varying intervals in accordance with records retention schedules reviewed, approved, and documented by the National Archives and Records Administration (NARA). Paper and microform records ready for disposal are destroyed by shredding or maceration. Records in electronic media are electronically erased using accepted techniques.

**4. Is the system using technologies in ways that the bureau/office 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.**

Yes, information in this system of records is collected and maintained to enable Public Debt to process transactions, to make payments, and to identify owners and their accounts.

**7. What kinds of information are collected as a function of the monitoring of individuals?**

- Account Name
- Account Address
- Social Security Number
- Tax Identification Number
- Contact Person
- Telephone Number
- ABA Routing Number
- Financial Institution Name
- Bank Account Name
- Bank Account Number
- Bank Account Type

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

Information stored in electronic media is safeguarded by automatic data processing security procedures in addition to physical security measures. For those categories of records stored in computers with online terminal access, the information cannot be accessed without the proper credentials.

**9. Under which Privacy Act SORN does the system operate? Provide number and name.**

BPD .003--United States Securities (Other than Savings-Type Securities)

**10. If the system is being modified, will the Privacy Act SORN require amendment or revision? Explain.**

The existing Privacy Act system of records, which covers this system, was not substantially revised in FY06 and FY07.

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

The primary users of data in the system will be BPD employees.

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

Access to system information is selectively granted based on employee's need to perform his/her official duties.

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

User's access is restricted through logical access controls that are system based mechanisms used to specify which individuals and/or processes are to have access to a specific system resource and the type of access that is to be permitted. These controls limit users' access to information and restrict their access on the system to their designated level.

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4. **What controls are in place to prevent the misuse (e.g., unauthorized browsing of data by those having access)?**

Public Debt has implemented suitable system, personnel and physical security measures to adequately protect the confidentiality and integrity of the information in the system.

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, was the Privacy Act contract clause inserted in their contracts and other statutory and regulatory measures addressed?**

Yes, contractors are involved in the development and maintenance of GAISS. The Privacy Act contract clause is included in their contracts along with other statutory and regulatory measures.

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

Yes. They are as follows:

Secure Payment System (SPS)

SPS is a Financial Management Service (FMS) system used for the secure transmission and certification of payment data via electronic means. A file is created from data in the InvestOne GAISS component and uploaded into SPS to make FHA debenture payments.

Financial Institution Information

Limited FHA debenture holder's banking information is shared with his/her financial institution to electronically process financial transactions. A FHA debenture holder must have an active account at a U.S. based financial institution. All payment transactions processed through GAISS are made by crediting the debenture holder's designated bank account at a financial institution via FMS's Secure Payment System (SPS) in conjunction with the Automated Clearing House (ACH) network. Financial institutions provide the initial defense against fraudulent or unauthorized transactions. Public Debt verifies the debenture holder's bank account information (ABA routing number and account number) prior to each semi annual interest payment. The information shared is limited to the following:

- The bondholder's ABA routing number
- The bondholder's account number
- The bondholder's account name
- The bondholder's account type
- The bondholder's tax identification number
- The dollar amount of the transaction

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Public Debt provides income earnings information on FHA bondholders to the Internal Revenue Service (IRS) to comply with the Internal Revenue Code.

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

All BPD employees who have access to information in a Privacy Act system are responsible for protecting personal information covered by the Privacy Act. The information owner, system manager, and ultimately the BPD CIO has the responsibility to see that the data is protected from all threats.

**8. Will other agencies share data or have access to the data in this system (e.g. Federal, State, Local, and Others)?**

Yes, in accordance with Title 5 U.S.C. Section 552a (b), Public Debt is permitted to release customer information in response to a subpoena or order issued by a U.S. based court. We are further permitted to release information to other government organizations to enable them to perform their official duties. These other government organizations are:

- Law enforcement agencies on the federal, state or local level;
- Employees or representatives of the General Accounting Office (GAS)
- Members of Congress, or their authorized representatives.

A government organization requesting access to customer information must;

- Submit the request in writing to Public Debt;
- Identify the specific information needed; and
- Specify the official nature of the request (such as a criminal investigation, audit, etc.)

A Public Debt official determines whether the organization's need for the information is justified, and responds to the request based on that determination.

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

See questions 6 and 8 above.

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

All BPD employees who have access to the system, the system manager, system owner, and ultimately the BPD CIO is responsible for assuring the proper use of data in the system.

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The Public Debt Disclosure Officer is responsible for administering requests for system data submitted to BPD involving the Privacy Act. BPD fully complies with the provisions of the Freedom of Information Act (FOIA), Title 5 U.S.C. Section 552, and the Privacy Act, Title 5 U.S.C Section 552a. BPD provides an established procedure to solicit requests to review and correct information recorded, and we have a dedicated Disclosure Officer who manages and administers the program.