

**Financial Management Service**  
**Privacy Impact Assessment**

**Name of Project: Debt Check**

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

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

Yes, the Debt Check application contains information about Federal delinquent debtors.

**a. Is this information identifiable to the individual<sup>1</sup>?**

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

Debt Check maintains data records that consist of a federal delinquent debtor's taxpayer identification number (TIN) – which can be either a social security number (SSN) or an employee identification number (EIN) along with the person's last name or the business entity's name.

**b. Is the information about individual members of the public?**

(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

Yes, Debt Check maintains information about Federal delinquent debtors.

**c. Is the information about employees?** (If yes and there is no information about members of the public, the PIA is required for the FMS IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

If an employee has a Federal delinquent debt his or her outstanding debt information will be in the Debt Check application.

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

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<sup>1</sup> "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).

The Debt Check system allows agencies and outside lenders to conduct a search of information extracted from the National Interactive Delinquent Debtor Database (NIDDD) to confirm whether potential recipients of Federal financial assistance owe delinquent non-tax debt to the Federal government for purposes of carrying out the law. The program also provides information as to whether potential recipients owe delinquent child support. Queries are submitted on-line by entering the last name and taxpayer identification number (TIN) of the loan applicant. If a delinquent debt is owed, the applicant would potentially be barred from receiving the loan, loan insurance or loan guarantee.

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

Federal law requires that people owing delinquent debt to the Federal government are barred from receiving Federal financial assistance in the form of loans, loan insurance and loan guarantees. Documents 31 U.S.C 3720B, 31 C.F.R. 285.13 and Presidential Executive Order 13019 established the foundation for the existence of the Debt Check application.

**B. DATA in the SYSTEM:**

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

Federal 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?**

Debt, Debtor, and Agency information for Debt Check is extracted from the Treasury Offset Program (TOP) system.

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

Federal agencies that are participating in TOP.

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

State and local agencies do not provide data for use in the Debt Check system.

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

Other than input from TOP and output through web pages, there are no systems providing information to or receiving information from Debt Check.

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

No information will be collected from the employee and the public.

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

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

There are no systems providing information to Debt Check other than TOP.

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

The data in Debt Check is extracted from TOP; therefore, it will depend on TOP's methods of checking for completeness.

**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).**

Debt Check is updated nightly with current information from the TOP Database.

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

Debt Check maintains data records that consist of a Federal delinquent debtor's taxpayer identification number (TIN) – which can be either a social security number (SSN) or an employee identification number (EIN) – along with the person's last name or the business entity's name. In addition, Debt Check maintains data pertaining to the creditor agency that submitted the delinquent debtor to the Treasury Offset Program. This information includes the agency's name, business address, and phone number.

**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, the data in use is both relevant and necessary for the purpose of this initiative.

- 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, the Debt Check System retrieves information on individuals who have a Federal delinquent debt, as requested by the user.

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

No data will be created by the Debt Check system.

- 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?**

The data is not being consolidated. The data comes only from the TOP database. The Bureau of Public Debt manages controls to protect data from unauthorized access.

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

The data is not being consolidated. The data comes only from the TOP Database. The Bureau of Public Debt manages controls to protect data from unauthorized access.

- 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 Debt Check user will enter a Taxpayer Identification Number (TIN) or Employee Identification Number (EIN) and Last Name or Business Name of the loan applicant to retrieve the data.

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

Queries are submitted on-line by entering the last name or business name and taxpayer identification number (TIN) of the loan applicant. The lookup results provide debt match information on the delinquent debtor. The report provides the debt number, the agency the debtor has the debt with, and the agency point of contact. Non-FMS, Federal government employees use Debt Check in a user role where they are limited to performing system inquiries.

**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.)**

There are no individuals or systems providing information to Debt Check other than TOP.

**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 system is only operated in one site.

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

Data is displayed as requested by the user and is not retained. Updated information is loaded nightly overwriting the data from the previous night.

**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?**

N/A

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

No, the system does not use any new technology that FMS has not previously employed.

**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.**

Debt Check offers monitors individuals for intrusion detection.

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

Audit trails retrieve information on the user id, reference number and the timestamp of the queries performed by the user.

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

The System Administrator is the only role with the privileges to access the audit trail. In addition all Debt Check users are required to sign the Debt Check Rules of Behavior. The Rules of Behavior clearly specify that users must not browse or search FMS data except in the performance of authorized duties.

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

The disclosure of Debt Check information to authorized Federal agencies and their designated lenders is in accordance with the Privacy Act of 1974 and the Privacy Act notice published by Treasury's Financial Management Service (see 65 Fed. Reg. 56612-01, Sept. 19, 2000).

Federal Register: June 14, 2005 (Volume 70, Number 113) 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.**

No, any system modifications will follow the rules provided in the Privacy Act of 1974 and the Privacy Act notice published by Treasury's Financial Management Service (see 65 Fed. Reg. 56612-01, Sept. 19, 2000).

**E. ACCESS TO DATA:**

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

Users of the application are internal FMS employees and non-FMS, Federal government employees working for agencies that issue Federal loans and/or loan guarantees and their designated lending partners.

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

Risk levels are associated with job descriptions to determine access levels for the Debt Check application. Managerial approval is required before a user is granted access to functions within the Debt Check application. Debt Check users are restricted to only the functions they need for the performance of their duties.

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

Non-FMS, Federal government employees use Debt Check in a user role where they are limited to performing system inquiries only which includes view access to all data and are not allowed to input or alter data within the system.

- 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)

Debt Check application users are restricted to only the functions they need for the performance of their duties.

Additionally, the Debt Check audit trail captures user login's, timestamps and system inquiries to prevent misuse of data by those having access.

- 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?

Contractors were not involved with the design and development of the system or the maintenance of the system.

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

Other than input from TOP and output through web pages, there are no systems providing information to or receiving information from Debt Check.

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

The Bureau of Public Debt and Financial Management Service are 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 government employees working for agencies that issue Federal loans and/or loan guarantees and their designated lending partners can have access to the data in Debt Check.

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

Debt Check information is provided to authorized Federal agencies and their designated lenders for the purpose of barring delinquent debtors from receiving Federal financial assistance in the form of loans, loan insurance and loan guarantees. The Debt Check system will allow federal agencies and outside lenders to conduct a search of information extracted from the National Interactive Delinquent Debtor Database (NIDDD) to confirm whether potential recipients of Federal financial assistance owe delinquent non-tax debt to the Federal government for purposes of carrying out the law.

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

Each federal agency is responsible for the proper use of data by their employees and designated lenders.