PRIVACY IMPACT ASSESSMENT

Section I. Nature of the System:

1. Provide the commonly used name of the system, spelling out any acronyms. If the system will be referred to by acronym, include that in parentheses after the name.

      Remittance System

2. In five sentences or less provide a generalized broad description of the system and its purpose. *(What does this system do; what function does it fulfill.)*

    The Remittance System is used to capture information pertaining to checks received by the agency. The agency receives checks from the public for Freedom of Information Act requests, Back Pay deposits, etc. When these checks are received by Finance, pertinent information is entered into the Remittance System and the checks are prepared for deposit in a local federal financial institution.

3. Describe the stage of development of this system:

      _____ This is a new system which is --
            _____ Still in the planning stages.
            _____ Mid-way to launch.
            _____ Ready for launch.
               Anticipated Launch Date: _____
      _____ We propose to change an existing system, the changes of which are
            _____ Still in the planning stages.
            _____ Mid-way to launch.
            _____ Ready for launch.
               Anticipated Launch Date: _____
      __X__ Other (Explain, providing the data required above for new or existing systems.)

This is an existing system that is in the maintenance stage.

4. Is this system required by law or Executive Order?

      __X__ No.
      _____ Yes. *(List the law or Executive Order and the implementing NLRB policies and regulations.)*

Section II. Data in the System:

1. Will this system contain personal data elements? *(See Definitions for a list of common data elements considered personal.)*

      No _____ *(Go to Section IX.)*
      Yes__X___ *(Continue.)*

2. List those personal data elements or types of data elements that the system will contain:

      This system will contain the name of the company or individual submitting a check to NLRB.

3.   What are the sources of the personal information in the system? *(Check all that apply:)*

      _____ NLRB files or databases.

      __X__ Non-NLRB files or databases. *(List.)*

      Data will be retrieved from an invoice and/or check.

      _____State and local agencies. *(List.)*

      _____
      _____
      _____

      _____The record subject himself.
      _____Supervisors.
      _____Other third party sources. *(List.)*

4. Are the personal data elements described in detail and itemized in a record layout or other document? If yes, provide the name of the document and attach a copy.

      No.

5. Review the list of personal data elements you currently collect. Is each data element essential to perform some official function? *[Note: This question only pertains to data elements you specifically solicit. It does NOT apply to personal data that may be voluntarily provided in a "Remarks," "Comments," "Explanation," or similar type of block where the individual is free to add information of his choosing.]*

      __X__5a. Yes, all data elements solicited are absolutely essential. *(Go to Section III.)*

      _____5b. Some of the solicited data elements are nice to have but not essential.

_____5c. None of the personal data elements are necessary. The program could function efficiently without personal data.

6. If you checked blocks 5b or 5c above, list the data elements that are not essential.

Section III. Verifying Data.

1. For data collected from sources other than NLRB records and the record subject himself, describe how the data will be verified for --

    a. Accuracy:

        Data is captured from information on the check and the associated invoice. Following this data is posted and reconciled with financial records by different persons in Finance.

    b. Completeness:

        Data is captured from information on the check and the associated invoice.

    c. Relevance:

        Data is captured from information on the check and the associated invoice. System indicates the data to capture.

    d. Timeliness:

        Data is captured from information on the check and the associated invoice upon receipt of check in the Finance Branch office.

2. Describe your procedures for determining if data have been tampered with by unauthorized persons. *(Note: Do not go into so much detail as to compromise system security.)*

        The application resides on existing NLRB platforms that are protected by the NLRB firewall and intrusion detection systems.

Section IV. Access to the Data.

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?

   Access to this system is provided to several persons in Finance that either key in the data or review the data for accuracy, completeness, and in order to make deposits or posting to financial records.

2. How is right of access to the data by a user determined?

   The Chief, Finance Branch determines who will have access to this system.

3. Are criteria, procedures, controls, and responsibilities regarding access documented?

   The system is established on a users workstation. And the associated files are limited by network security to that user. From that standpoint, there is documentation to setup and control user access.

4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access? *(Note: Do not go into so much detail as to compromise system security.)*

   Network and workstation access is limited to assigned users with the proper ID and password. Users are trusted senior finance personnel.

5. Do other systems share data or have access to data in this system?

   No _____
   Yes__X__ *(Explain.)*

Relevant financial information is booked into the agency financial system (Momentum) and the Back Pay system.

6. Will other non-NLRB agencies share data or have direct access to data in this system (International, Federal, State, Local, Other)?

   No _X_ *(Go to Question IV-9.)*
   Yes____ *(List each agency by name or type (e.g., law enforcement activities; Social Security Administration, etc.) and briefly provide the purpose of the access.)*

7. How will the system ensure that agencies only get the information they need to fulfill their official functions?

N/A

8. Who will be responsible for protecting the privacy rights of individuals and employees affected by the interface between agencies?

N/A

9. Who is responsible for assuring proper use of the data? *(List name, title, mailing address, and current telephone number.)*

> Karl Rohrbaugh
> Chief, Finance Branch
> Room 7830
> 1099 14th Street, NW
> Washington, DC 20570-0001
> (202) 273-4226

Section V. Attributes of the Personal Data.

1. Is the use of the personal data both relevant and necessary to the purpose for which the system is being designed?

> No_____ *(Explain.)*
> Yes <u>X</u>

2. Will the system derive new data or create previously unavailable data about an individual through a data aggregation process

> No <u>X</u> *(Go to Section VI.)*
> Yes_____ *(Continue.)*

    2a. Will the new data be placed in the individual's employment or other type of record (whether manual or electronic) that is retrieved by name, SSN, or other personal identifier?

> No_____
> Yes_____ *(Identify the record, database, or type of record or database.)*
>
> Not Applicable <u>X</u>

    2b. Can the system make determinations about individuals or employees that would not be possible without the new data?

> No_____
> Yes_____ *(Explain.)*
>
> Not Applicable <u>X</u>

2c. Will the data be retrieved by personal identifier (name, SSN, employee number, computer ID number, etc.)

No _____ *(Go to Section VI.)*
Yes_____*(List retrieval fields.)*

Not Applicable X

Data can be retrieved by name of company or individual that has submitted a check.

2d. What are the potential effects on the due process rights of citizens and lawfully admitted aliens?

There will be no impact.

2d-1. Consolidation and linkage of files and systems?

Not Applicable   X

2d-2. Derivation of data?

Not Applicable   X

2d-3. Accelerated information processing and decision-making?

Not Applicable   X

2d-4. Use of new technologies?

Not Applicable   X

2e. How are any effects discussed in 2d-1 through 2d-4 to be mitigated?

Not Applicable   X

Section VI. Maintenance of Administrative Controls.

1. Explain how the system and its use will ensure equitable treatment of individuals. *(NOTE: If the system is operated in more than one site, also include a discussion of how consistent use of the system and data will be maintained in all sites.)*

    The system has a very basic use and that is to record the receipt of checks in Finance.

2. Explain any possibility of disparate treatment of individuals or groups.

    There will be no disparate treatment of individuals or groups.

3. What are the retention periods for the data in this system?

    A schedule of retention is being revised by NLRB.

    3a. Does your retention period agree with that listed in Appendix 1, of NLRB Files Management and Records Disposition Handbook?

    No_____ *(Explain.)*
    Yes_____ *(List disposal rule from Appendix 1, of NLRB Files Management and Records Disposition Handbook.)*

    N/A____ A retention schedule is being developed by NLRB.

    3b. What are the procedures for eliminating the data at the end of the retention period?

    N/A_____A retention schedule is being developed by NLRB.

    3c. Where are the procedures discussed in Question 3b above documented?

    N/A____A retention schedule is being developed by NLRB.

    3d. Is the system using technologies in ways that the NLRB has not previously employed (e.g. Caller-ID, surveillance, etc.)?

    No __X__ *(Continue.)*
    Yes_____ *(Identify the technology and describe how these technologies affect individual privacy.)*

    3e. Will this system provide the capability to identify, locate, and monitor individuals?

No   X
Yes_____ (Explain.)

3f. Will this system provide the capability to identify, locate, and monitor groups of people?

No X
Yes___ (Explain.)

3g. What controls will be used to prevent unauthorized monitoring? *(Note: Do not describe your controls and procedures in so much detail as to compromise system security.)*

Access to this system is limited to those assigned the system and having the proper network and workstation security access.

Section VII. Interface with Privacy Act Systems of Records.

1. Does this system currently operate under an existing NLRB or Government-Wide Privacy Act system of records? *(Note: The NLRB and Government Wide systems are described at: http://www.access.gpo.gov/su_docs/aces/PrivacyAct.shtml and http://www.whitehouse.gov/omb/memoranda/m99-05-c.html*

      No __X__ *(Go to Section VIII*
      Yes _____ *(Continue.)*

2: Provide the identifying number and name of each system.

      Not Applicable X

3. If an existing NLRB Privacy Act system of records is being modified, will the system notice require amendment or alteration? *(List all proposed changes. Consider the following: Will you be collecting new data elements not previously approved for collection; using the data for new internal purposes; sharing the data with new non-NLRB agencies; keeping the records longer; creating new locations of data, etc?)*

      No_____
      Yes_____ *(Explain your changes.)*

      Not Applicable X

4. If the system currently operates under an existing Government-Wide Privacy Act system of records notice, are your proposed modifications in agreement with the existing notice?

      No ___ *(Explain your changes and continue.)*
      Yes ___ *(Go to Section VIII.)*

      Not Applicable X

5. If you answered "no" to VII-4 above, have you consulted with the government agency that "owns" the government-wide system to determine if they approve of your modifications and intend to amend or alter the existing notice to accommodate your needs?

      No_____
      Yes_____ *(Provide the name and telephone number of the official with responsibility for the government-wide system.)*

      Not Applicable X

Section VIII. Certification:

Certification: I have read and understand the purpose of this assessment. I have also reviewed the definition of "personal data" and have accurately listed the personal data elements collected or accurately answered "no" to Question II-1.

Name: Karl Rohrbaugh
Title: Systems/Program Manager
E-Mail Address: Karl.Rohrbaugh@nlrb.gov
Telephone Number: 202-273-4230
FAX Number: 202-273-4273
(Signature) *For, Frank P. Snyder*
(Date) *3/30/2006*

Name: Tommie Gregg, Sr.
Title: Privacy Act Officer
E-Mail Address: tommie.greggsr@nlrb.gov
Telephone Number: 202-273-2833
FAX Number: 202-273-4286
(Signature) *Tommie Gregg Jr.*
(Date) *3 - 27 - 06*

Name: Richard Westfield
Title: Chief Information Officer
E-Mail Address: richard.westfield@nlrb.gov
Telephone Number: 202-273-0222
FAX Number: 202-273-2850
(Signature) *Richard Westfield*
(Date) *3/30/2006*