

**Overseas Private Investment Corporation  
Privacy Impact Assessment (PIA)**

**Overview**

**Date of this Submission:** January 14, 2008

**System Owner(s):**

Jim Tupper, Manager, Business Information Systems

Sheryl Swisher, Director of Financial Management

**Department(s):**

Office of the Chief Information Officer

Office of the Chief Financial Officer

**Title of system or information collection:** Oracle E-Business Suite (Oracle EBS)

**Is this system or information collection new or is an existing one being modified?** Existing System; New PIA

**Does this system collect, maintain, and/or disseminate Personally Identifiable Information (PII) about members of the public?** Yes

**Identifying Numbers (Use N/A, where appropriate)**

**Unique Project Identifier Number:** 184-20-02-00-01-4200-00-404-139

**System of Records Number:** N/A

**OMB Information Collection Approval Number and Expiration Date:** N/A

**Other Identifying Number(s):** N/A

**Description**

**1. Describe what information is to be collected (e.g., nature and source).**

The Oracle EBS system contains personally identifiable information (PII). The PII data elements contained in the Oracle EBS system are social security numbers. OPIC considers the PII contained within Oracle EBS to be Sensitive But Unclassified (SBU) information, and has applied the security controls necessary for the protection of SBU information (NIST SP 800-53).

**2. Explain why the information is being collected.**

The Accounts Payable and Purchasing modules of the Oracle EBS application are used to process Personal Services Contractors (PSCs) payroll, employee reimbursements and vendor payments. These payments are disbursed by OPIC via the FMS Treasury Secure Payment System (SPS). PSC contractors and some vendors use their Social Security Number (SSN) as their Taxpayer Identification Numbers (TIN) if they work for themselves.

**3. Describe the intended use of the information, and explain how the data collected are the minimum necessary to accomplish the purpose for this effort.**

TINs are used to process payments to OPIC PSC contractors, employees and vendors. A valid TIN must be included in all payments made by OPIC via the FMS Treasury SPS. This TIN is used by Treasury to offset any liabilities of these individuals or companies to the US Government such as non-payment of taxes. Information on payments to OPIC vendors for tax purposes is submitted via 1099's to the vendors and the IRS each calendar year. W-2's are issued for PSC's. TIN's are required for both sets of reporting.

**4. Identify with whom the agency will share the collected information.**

The information is maintained solely for OPIC internal use. Tax ID numbers are shared with the Department of Treasury, State and Federal governments (State governments for PSC income taxes withheld, Internal Revenue Service for federal taxes withheld, and for payments to OPIC Vendors).

**5. Describe any opportunities 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.**

A TIN must be furnished on returns, statements, and other tax related documents; mandatory data collection. An Employer Identification Number (EIN) is also known as a federal tax identification number, and is used to identify a business entity.  
(<http://www.irs.gov>)

**6. Describe how the information will be secured (e.g., administrative and technological controls).**

Oracle EBS is in the process of a certification and accreditation effort, which is registered with the Information Systems Security Officer (ISSO). The baseline security controls from NIST 800-53 have been applied and the security controls were last reviewed on November 15, 2007. The system files are regularly backed up and stored off-site. Users are trained in their responsibilities to protect the PII maintained within the system.

Physical access to Oracle EBS is secured by use of identification badges and restricted access to the facilities where the system is hosted.

Logical access to Oracle EBS is secured by the use of user ids and passwords and restricted access to the desktop workstations from which the system is accessed.

**7. Identify whether a system of records is being created under section 552a of Title 5, United States Code (the Privacy Act), or identify the existing Privacy Act system of records notice under which the records will be maintained.**



Oracle EBS does not require a system of records notice, as defined by the Privacy Act of 1974, as amended, 5 U.S.C. 552a.


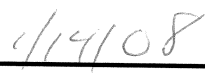
**8. Describe the choices the agency made regarding this IT system or collection of information as a result of performing the PIA.**

Because the system and information collection were in operation at the time the PIA was conducted, OPIC made no changes to Oracle EBS or the information collection process as a result of performing the PIA.

Overseas Private Investment Corporation  
Oracle E-Business Suite  
Privacy Impact Assessment Approval

I have reviewed and approve the attached Privacy Impact Assessment.

   
\_\_\_\_\_  
James Tupper  
Manager, Business Information Systems  
Technical System Owner  
Date

   
\_\_\_\_\_  
Sheryl Swisher  
Director of Financial Management  
Business System Owner  
Date