Privacy Impact Assessment: Financial Management System

Is this a new or substantially revised electronic information system? If revised, describe revisions.

- No, this is not a new system or revised electronic information system.

If any question does not apply, state not applicable (N/A) for each question and explain why.

I. Describe the information to be collected (e.g., nature and source). Be sure to include any information in an identifiable form, e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc).

Source=PEACE CORPS DATABASES
PCVDBMS database: The data exported to the FMS is available from the single PCVDBMS database. The PCVDBMS provides PC, Crisis Corps and UN Volunteer personal and country assignment data for those individuals who have just attended PC staging events. Information imported from PCVDBMS includes Name, address, email address, telephone number, Volunteer ID number, and social security number. This information is retained electronically for a minimum of 7 yrs 3 months in order for the associated Volunteer payments to clear and be reconciled.
Source=OTHER FEDERAL AGENCIES' DATABASES
U.S. Dept of State: Data for overseas Direct Hire Foreign Service National employees (FSN) is provided. Information in the system includes: Name, State Dept Identifier and country assignment data. **U.S. Dept of Treasury:** Staff in PC's Office of Private Sector Initiatives enters information into the FMS based on donations collected via the Financial Management Service's "Pay.Gov" portal. Information in the system includes: Name, address, donation amount.
Source=THIRD PARTY SOURCES
SATO Travel: The Financial System receives data on travel tickets issued for Volunteers, Employees, and Contractual staff. Exported information to the FMS includes: Traveler name, ticket amount, and destination.

> **Source=INDIVIDUALS, CONTRACTUAL STAFF, or VOLUNTEERS**
>
> - *Employees of Contractors*
> These contractors may provide banking information for payment of travel expenses or reimbursements.
>
> - *Personal Services Contractors (PSC)*
> PSC's provide data to be captured in the system which includes: Banking information, Taxpayer Identification Number (TIN), PSC vendor Data Universal Numbering System (DUNS) number.
>
> - *Volunteers*
> In addition to data provided by the PCVDBMS database, Volunteers provide banking and Emergency Contact information.

II. Why is the information being collected (e.g., to determine eligibility)?

> The Peace Corps (PC) Financial Management System (FMS) maintains information for individuals the agency owes/owed money to or who receive/received a payment including those who owe/owed money to the United States. These individuals consist of Peace Corps Volunteers, Crisis Corps Volunteers; United Nations Volunteers; and returned Volunteers; Personal Services (PSC) and Other Contractors, Consultants, and Vendors who travel or perform certain services for PC; Donors; and Individuals that have been identified by Peace Corps Volunteers, Crisis Corps Volunteers, or returned Volunteers as their contacts for W-2 purposes.

III. How will the information be used (e.g., to verify existing data)?

> - See responses under Question IV.

IV. Will you share the information with others (e.g., another agency for a programmatic purpose)? If yes, list the entities.

> Other agencies are not given direct access to the FMS. Instead, data is downloaded and transmitted to:
>
> - U.S. Dept of Treasury/ Financial Management Service
> - U.S. Dept. of State/Financial Service Centers (FSC)
> - U.S. Dept of Treasury/ Bureau of the Public Debt
> - General Services Administration (GSA)

U.S. Dept of Treasury/ Financial Management Service:
- To produce U.S. Dollar payments to/on the behalf of:
  - PC/CC Volunteers
  - UN Volunteers
  - Personal Services Contractors
  - Other Contract Staff
- To share information on individuals with debts owed to PC :
  - PC/CC Volunteers
  - UN Volunteers
  - Personal Services Contractors
  - Other Contract Staff

U.S. Dept. of State/ Bangkok FSC/ Charleston FSC:
- To produce local currency and U.S. Dollar payments to/on the behalf of:
  - PC/CC Volunteers
  - UN Volunteers
  - Personal Services Contractors
  - Other Contract Staff

U.S. Dept of Treasury/ Bureau of the Public Debt:
- To issue Savings Bonds purchased by PC/CC Volunteers

GSA:
- To provide Contract award data maintained in the Federal Procurement Data System (FPDS) which tracks awards made to federal government vendors

Insurance Providers:
Clements International – To provide information on Returned Volunteers who have requested medical insurance coverage for themselves and their dependents (if any) after their Peace Corps service.
Metropolitan Life – To provide information on Peace Corps Volunteers who have elected to purchase life insurance.
AON Consulting – To provide information on Peace Corps Volunteers who have elected to purchase personal property insurance.

V. Describe what opportunities individuals have been given to decline to provide information or to consent to particular use of the information (e.g., whether individual may withhold permission for a particular use).

- *Volunteers*
Volunteer SSN's are required, because the absence of that information will delay or prevent payment. When an individual agrees to Volunteer service, his or her SSN is also required for Federal tax and Social Security reporting. (During the Volunteer application process and prior to attending the Staging are the occasions when Volunteer Applicants can withhold SSN information). In addition, the information provided to external insurance organizations is voluntary and is done at the request of the Volunteer at the time of staging or Close of Service conference.

- *Personal Services Contractors (PSC)*
Similarly, Personal Services Contractors are advised that the absence of required information will delay or prevent payment for their services. They are advised of these requirements at the time of contract award. (Note: GSA's CCR registry requires the vendor to provide a Tax ID number).

VI. How will the information be secured (e.g., administrative and technological controls)?

ADMINISTRATIVE CONTROLS

Agency supervisors approve user access and determine specific levels of user access in the system.

In general, supervisors work with FMS Help Desk staff to determine a set of "User responsibilities" that allow a reasonable "separation of duties" while entering or changing FMS records. Agency supervisors then approve user access and determine each staff member's specific level of access. Each user is assigned "User Responsibilities" which are based on the types of records they should be accessing on a daily basis.

TECHNOLOGICAL CONTROLS

For Odyssey, the ERP application forms restrict types of data accessed in the system. "User responsibilities" provide form level access to data within a module/application. In FOR Post, the "User group" limits the data for that office function. FOR Post automatically restricts Posts to accessing or reviewing their own data.

The FMS computerized records are maintained in a secure, password-protected computer system. The FMS along with other Peace Corps systems are operated under procedures and policies that follow the Federal Information Standards Processing Standards Publications (FIPS Pub). PC requires that users of the network, PC systems and data work with strict regard for data/systems integrity and confidentiality ensuring that there is consistently high availability.

VII. How will the data be retrieved (e.g., will it be retrieved by a personal identifier such as name, social security number, address, telephone number or some other identifier that is unique to an individual)? Will a System of Record Notice be created under the Privacy Act, 5 U.S.C. 552a?

DATA RETRIEVAL

Data can be retrieved by name, Volunteer ID number, SSN, contract or purchase order number, invoice number, payment batch number, customer number or vendor number, DUNS number.

SORN#: Peace Corps Privacy Act System of Record Notice 22/Federal Register #25343 – 25344 [07-2211].
System Name: **Financial Management System (FMS)**