



Privacy Impact Assessment

Financial Management Modernization Initiative (FMMI)

Revision: 3

Office of the Chief Financial Officer

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Document Information

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Revision History			
Revision	Date	Author	Comments
1	11/21/08	Matt OBrion	Initial Version
2	1/21/09	Matt OBrion	Updates
3	8/11/09	Jerry Chenault	Update comments

Distribution List			
Name	Title	Agency/Office	Contact Information



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1 System Information

System Information	
Agency:	Office of the Chief Financial Officer
System Name:	Financial Management Modernization Initiative (FMMI)
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p>Financial Management Modernization Initiative (FMMI) is USDA's new enterprise-wide, FSIO-compliant financial system that will be replacing FFIS and other Legacy systems. FMMI will provide General Ledger Management, Funds Management, Fund Balance with Treasury, Payment Management, Receivables Management, Cost Management, and Reporting. FMMI will be a web-based solution providing web-based access for all financial users. FMMI will have interfaces to other financial systems at USDA, such as Payroll, CPAIS, IAS, and GovTrip. The implementation is targeted to have 3 primary deployments which will impact 28 Agencies/Staff Offices. Deployments 1 and 2 will impact approximately 5,500-6,000 users across the United States.</p> <p>FMMI will be built on the SAP ERP Central Component 6.0 (ECC) platform – specifically the modules Financials (FI), Controlling (CO), Funds Management (FM), Materials Management (MM), and Sales and Distribution (SD). In addition, FMMI will utilize SAP Business Intelligence for Reporting, SAP Process Integration for interfaces to other systems, and SAP Governance, Risk, and Compliance for ensuring Segregation of Duties controls are enforced.</p> <p>Enhanced functionality is provided through the use of custom RICEFW objects to supplement the standard SAP ERP software. RICEFW Objects have been developed for reports, interfaces, conversions, enhancements, forms, and workflows.</p>
Who owns this system? (Name, agency, contact information)	Mike Clanton Associate Chief Financial Officer – Financial Systems Planning and Management (ACFO-FSPM) Office of the Chief Financial Officer (202) 690-3065 Mike.Clanton@usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Aimee Riley ACFO-FSPM Office of the Chief Financial Officer (504) 426-5628 aimee.riley@usda.gov



Privacy Impact Assessment for FMMI

Who completed this document? (Name, agency, contact information)	Matt OBrion ACFO-FSPM Office of the Chief Financial Officer (703) 947-3416 james.m.obrion@accenture.com
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2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	FMMI will contain USDA employee data, government and commercial vendor data, agency budget execution data, procurement data, financial data, and program and administrative information. This data is used for financial planning and management, to make payments, and for reporting to government agencies, such as to Treasury and the Office of Management and Budget for budget execution, cash, and obligations.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	The system does not collect this information from individuals. However, it will exist as a result of conversion from Legacy systems and interfaces with systems that do maintain it. Document – SORN covers the data that is fed through interfaces. Social Security Act, Internal Revenue Services, Treasury, Office of Management and Budget
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



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No.	Question	Response
4	Sources of the data in the system.	<p>The two primary sources for data in FMMI are conversion from legacy systems and interface with external systems.</p> <p>Systems that will provide data for conversion to FMMI include:</p> <ul style="list-style-type: none"> • Financial Data Warehouse (FDW) • Foundation Financial Information System (FFIS) <p>Systems that provide data to FMMI through interface include:</p> <ul style="list-style-type: none"> • Government On-Line Accounting Link System (GOALS) II • Financial Statements Data Warehouse (FSDW) • SmartPay 2 • Corporate Property Automated Information System (CPAIS) • Integrated Acquisition System (IAS) • Payroll • LockBoxes - US Bank & Citibank • GovTrip • TRVL • Central Contractor Registry (CCR)
4.1	What data is being collected from the customer?	None
4.2	What USDA agencies are providing data for use in the system?	All
4.3	What state and local agencies are providing data for use in the system?	County and state offices associated with FSA, NRCS, and RD.
4.4	From what other third party sources is data being collected?	<p>Northrop Grumman – owner of GovTrip system</p> <p>US Bank and Citibank – Lock box vendors</p> <p>GSA – owner of CCR system</p> <p>Financial Management Service (FMS) – owner of GOALS system</p>
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	

2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	This data is used for payments, receipts and for financial management reporting. Agency and mission area financial accountants utilize the system. The information is also used to send disbursements to Treasury, income data to IRS and financial reporting to OMB.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	FMMI does not collect information from individuals.
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.



No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Data is retained for 6 years and 3 months.
14.2	What are the procedures for purging the data at the end of the retention period?	TBD
14.3	Where are these procedures documented?	TBD
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	TBD
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	Treasury for disbursements, IRS for income tax collection. OMB for financial reporting.
17.2	Who is responsible for assuring the other agency properly uses the data?	Data exchange agreements
18	Is the data transmitted to another agency or an independent site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 19.



No.	Question	Response
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	As these interfaces are developed, the appropriate documentation (Interconnection Security Agreement and/or Memorandum of Understanding) will be created.
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No - If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Users will not have direct access to the data in the system. Rather, users will access data through the FMMI application. Administrators will not have access to privacy data.
21	How will user access to the data be determined?	Access will be role-based. Every user must go through an approval process to receive access under a specific role.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	The FMMI application will limit user access to data. Users will launch transactions to perform their job functions within FMMI. Within a given transaction, the relevant data is visible to the user. Reports will only show data that is required for business use.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	The USDA Agencies and Staff Offices are responsible for protecting the privacy rights of citizens and employees with respect to FMMI.



No.	Question	Response
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Customers and employees can contact the Privacy Officer of their agency or of the Department. Instructions are provided in the Systems of Records (SOR) notice.
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No USDA Cyber Security policy on Incident Reporting
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: <ul style="list-style-type: none"> ▪ Consolidation and linkage of files and systems ▪ Derivation of data ▪ Accelerated information processing and decision making ▪ Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	FMMI implements a role based access model and enforces Segregation of Duties to ensure that no individual is able to circumvent the system. In addition, all users of FMMI will be required to complete annual security training and sign a Rules of Behavior agreement. These controls ensure equitable treatment of customers.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	

3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31



No.	Question	Response
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	The data in FMMI is retrieved through the application only. Depending on the type of transaction in use, the identifying attribute may be a few different things. However, the identifying attribute is typically an identifier specific to FMMI that has been assigned by the application. Only a few power users will be able to do any searches on SSN, TIN, etc.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	There are currently several Systems of Records (SOR) notices that apply to FMMI. These are: USDA/OCFO – 3, Billings and Collections Systems USDA/OFM – 4, Travel and Transportation System USDA/OFM – 7, SF-1099 Reporting System USDA/OP – 1, Personnel and Payroll System for USDA Employees A new consolidated SOR notice will be completed in 2009.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.



Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Financial Management Modernization Initiative
(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

System Manager/Owner
OR Project Representative
OR Program/Office Head.

Date

Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

Date

Agency OCIO

Date



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