



**MILLENNIUM**  
**CHALLENGE CORPORATION**  
**UNITED STATES OF AMERICA**

# Privacy Impact Assessment MCC Integrated Data Analysis System (MIDAS)

January 22, 2010  
Version 1.0

**Millennium Challenge Corporation**  
**875 15th Street N.W.**  
**WASHINGTON, DC 20005**

<b>ACTION:</b>	<b>APPROVER:</b>	<b>SIGNATURE:</b>	<b>DATE:</b>
<b>APPROVAL:</b>	Dean Ergenbright, MCC Chief Privacy Officer		January 25, 2010

## TABLE OF CONTENTS

---

<b>1</b>	<b>DEFINITIONS</b> .....	<b>4</b>
<b>2</b>	<b>PIA CONTACTS AND OVERVIEW</b> .....	<b>5</b>
2.1	CONTACT INFORMATION .....	5
2.2	OVERVIEW .....	7
<b>3</b>	<b>COLLECTION OF INFORMATION</b> .....	<b>8</b>
3.1	WHAT INFORMATION IS COLLECTED, USED, DISSEMINATED, OR MAINTAINED IN THE MIDAS SYSTEM? .....	8
3.2	WHY IS THE INFORMATION BEING COLLECTED, USED, DISSEMINATED, OR MAINTAINED BY THE MIDAS SYSTEM? .....	8
<b>4</b>	<b>USES OF THE INFORMATION</b> .....	<b>8</b>
4.1	HOW WILL THE INFORMATION BE USED? .....	8
4.2	WITH WHOM WILL THIS INFORMATION BE SHARED? .....	8
4.3	WHAT OPPORTUNITIES DO INDIVIDUALS HAVE TO DECLINE TO PROVIDE THE INFORMATION AND HOW CAN INDIVIDUALS GRANT CONSENT? .....	8
<b>5</b>	<b>SECURING THE INFORMATION</b> .....	<b>9</b>
5.1	HOW IS THE INFORMATION SECURED? .....	9
5.2	WHAT SECURITY CONTROLS ARE IN PLACE TO PROTECT THE INFORMATION? .....	9
<b>6</b>	<b>SYSTEM OF RECORDS NOTICE</b> .....	<b>9</b>
6.1	WILL A SYSTEM OF RECORDS BE CREATED OR UPDATED UNDER THE PRIVACY ACT, 5 U.S.C. 552A? .....	9
<b>7</b>	<b>RESULTING DECISIONS</b> .....	<b>9</b>
7.1	WHAT CHOICES DID THE AGENCY MAKE REGARDING MIDAS OR THE COLLECTION OF INFORMATION AS A RESULT OF PERFORMING THE PIA? .....	9

## 1 Definitions

- 1.1 **MIDAS System.** MIDAS is an integrated reporting system that allows for reporting across MCC business areas. MIDAS allows for projected financial, procurement, and performance data from various sources to be uploaded and stored in a stable and secure environment.
- 1.2 **Information in Identifiable Form.** 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).
- 1.3 **Privacy Impact Assessment (PIA).** An analysis of how information is handled: (i) to ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy, (ii) to determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system, and (iii) to examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.
- 1.4 **Collect/Collection.** As used herein, to collect or collection means to gather, or accumulate, or to recover or take control over.
- 1.5 **System of Record.** A group of records that are retrieved by some kind of personal identifier, such as a name or number.
- 1.6 **Electronic Storage.** As used herein, to store has the meaning used in the 18 U.S.C § 2510, *i.e.*, “(A) any temporary, intermediate storage of a wire or electronic communication incidental to the electronic transmission thereof; and (B) any storage of such communication by an electronic communication service for purposes of backup protection of such communication”.

## 2 PIA Contacts and Overview

### 2.1 Contact Information

System Title: <b>MCC Integrated Data Analysis System</b> Acronym: <b>MIDAS</b>
Office of Responsibility: MCC/Administration and Finance 875 15 <sup>th</sup> Street NW Washington, DC 20005
Enter the information for the System Owner  Name: Michael Casella Title: Acting Vice President, Administration and Finance Street: 875 15th Street NW City: Washington State: DC Zip Code: 20005 Telephone: 202-521-3723 Email: <a href="mailto:casellam@MCC.gov">casellam@MCC.gov</a>  <b>Signature:</b> <b>Date:</b>
Enter the information for other designated contacts for the system  Name: Catherine Marschner Title: Program Officer Street Address: 875 15th Street NW City: Washington State: DC Zip Code: 20005 Telephone: 202-521-3618 Email: <a href="mailto:marschnerc@MCC.gov">marschnerc@MCC.gov</a>

Enter the information for the Chief Privacy Officer

Name: Dean Ergenbright  
Title: Deputy CIO and Chief Privacy Officer  
Street: 875 15th Street NW  
City: Washington State: DC Zip Code: 20005  
Telephone: 202-521-7230  
Email: [ergenbrightde@MCC.gov](mailto:ergenbrightde@MCC.gov)

Enter the information for the Information System Security Officer

Name: Trey Carr  
Title: Chief Information Security Officer  
Street: 875 15th Street NW  
City: Washington State: DC Zip Code: 20005  
Telephone: 202-521-2688  
Email: [carrt@MCC.gov](mailto:carrt@MCC.gov)

## 2.2 Overview

The MIDAS system is an integrated reporting system that allows for reporting across MCC business areas. MIDAS allows for projected financial, procurement, and performance data from various sources to be uploaded and stored in a stable secure environment. The MIDAS system is composed of five servers and resides on the MCCNet General Support System (GSS). The end user accesses the system through a web browser from MCCNet. The end user is authenticated and validated through the GSS login. The application is only available from within MCCNet. The various components have been integrated with the SharePoint platform and SharePoint serves as the primary delivery mechanism for MIDAS.

The Office of Management and Budget (OMB) requires agencies to conduct Privacy Impact Assessments for electronic information systems and collections and, in general, make them publicly available. OMB provides guidance to agencies on implementing the privacy provisions of the E-Government Act of 2002 in OMB M-03-22. This guidance allows agencies the flexibility of determining the depth and content of a PIA. In addition, M-03-22 allows the development of standardized forms and templates for completing PIA's. This PIA format was developed to meet the requirements of the E-Gov Act of 2002 as outlined in M-03-22.

Memorandum 03-22 identified eight topics that must be covered within the content of a PIA. They are as follows:

1. Information to be collected
2. Reason for the collection of the information
3. Intended use of the information collected
4. The sharing of the information
5. Declining or consenting to provide the information
6. Securing the information
7. Creating a system of records under the Privacy Act, 5 U.S.C. 552a
8. Any choices that the agency made regarding an IT system or collection of information as a result of performing the PIA

The MCC Privacy Office developed this PIA template to respond to the eight topics. The MCC Privacy Office reserves the right to request clarification, supporting documentation or expanded answers to these questions before determining whether approval is granted. The information provided in the PIA is final product of an analysis of information by the system owner, based on information received and discussed between various system stakeholders, such as developers, users, managers, system ISSO or IT project managers.

### **3 Collection of Information**

#### **3.1 What information is collected, used, disseminated, or maintained in the MIDAS system?**

The information collected, used, disseminated or maintained within the MIDAS system is as follows:

- Approved MCA Quarterly Disbursement Request (QDRP) Data, including financial, procurement, and performance data as reported by the Millennium Challenge Account Accountable Entities
- MCC financial data as transmitted by the National Business Center (NBC)
- There is no Personally Identifiable Information collected in MIDAS

#### **3.2 Why is the information being collected, used, disseminated, or maintained by the MIDAS system?**

The MIDAS system was designed to act as a central data repository all MCC financial data required for management reporting, and all MCA financial, procurement, and performance data. MIDAS has the capabilities to generate reports on the data in a variety of formats as needed by MCC.

### **4 Uses of the Information**

#### **4.1 How will the information be used?**

The information will be used for a variety of internal and external reporting mechanisms. MCC staff have varying levels of access to the MIDAS system for internal reporting; any reporting to external audiences through MIDAS is completed internally by MCC staff and cleared for external release. No external audiences have access to the MIDAS system.

#### **4.2 With whom will this information be shared?**

Some of the information contained in the MIDAS database is for internal MCC use only. Certain MCC and MCA data is reported to external constituencies, including Congress.

Much of the QDRP data collected from MCAs is already publicly available from the MCAs; MCC publishes some of this information on the MCC website and disseminates certain aggregate data as appropriate.

#### **4.3 What opportunities do individuals have to decline to provide the information and how can individuals grant consent?**

Not applicable, as there is not any Personally Identifiable Information (PII) contained in the MIDAS system.



## **5 Securing the Information**

### **5.1 How is the information secured?**

The MIDAS application is accessible only through MCCNet, with MIDAS-specific and MCCNet access controls in place.

### **5.2 What Security Controls are in Place to Protect the Information?**

MIDAS users must have access to MCCNet. MIDAS uses single sign-on (SSO) technology; users are identified and authenticated when they log into MCCNet. Access to MIDAS is controlled through Active Directory Security Groups. Access is controlled at the report level and access must be requested and is granted by the system administrator based upon user roles.

## **6 System of Records Notice**

### **6.1 Will a system of records be created or updated under the Privacy Act, 5 U.S.C. 552a?**

No, as there is not any Personally Identifiable Information (PII) contained in the MIDAS system.

## **7 Resulting Decisions**

### **7.1 What choices did the agency make regarding MIDAS or the collection of information as a result of performing the PIA?**

A system of records is not necessary for MIDAS as the system does not capture any PII. Additionally, MCC completed a security controls assessment, which will be regularly reviewed and updated as documented in the MIDAS System Security Plan.