**Universal Automated Clearing House (UA) Component
Privacy Impact Assessment (PIA)**

August 2009

System Information

Name of Project or Program: **Universal Automated Clearing House Component**
OMB Unique Identifier: 015-35-01-01-01-1007-00

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System Application/General Information

1. **Does this system contain any information in identifiable form?**

Yes.

2. **What is the purpose of the system/application?**

The UA (Automated Clearing House) Component handles ACH processing
requests from any application defined to it. It is able to collect and prepare for
transmittal ACH debits, credits, pre-notes, and contingency files. It will also
accept and process ACH acknowledgements and returns.

3. **What legal authority authorizes the purchase or development of this
system/application**

Authority for Maintenance of the System:
5 U.S.C. 301; 31 U.S.C. 3101 *et seq.*

Development of this application was approved through Public Debt's IT Governance process (initiative number 1365).

4. **Under which Privacy Act SORN does the system operate? (Provide the system name and unique system identifier.)**

   BPD .002--United States Securities (Savings-Type Securities)
   BPD .003--United States Securities (Other than Savings-Type Securities)

Data in the System

1. **What categories of individuals are covered in the system?**

   Data in this system can cover Individuals, Entities (such as Trusts), State and Local Governments, and other Federal agencies.

2. **What are the sources of the information in the system?**

   The UA component provides a processing service to other systems and information is provided by those systems.

   a. **Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

      Data from multiple sending applications is collected to UA, but each record is uniquely identified and linked to the sending application.

   b. **What Federal agencies are providing data for use in the system?**

      Data from multiple sending applications is collected to UA. Agencies providing data is determined by the sending application.

   c. **What State and/or local agencies are providing data for use in the system?**

      Data from multiple sending applications is collected to UA. Agencies providing data is determined by the sending application.

   d. **From what other third party sources will data be collected?**

      Determined by the sending application. The UA Component will only process data from other Bureau of Public Debt applications that have been specifically defined to it.

e. What information will be collected from the employee and the public?

Though the UA component does not directly collect data, it does store and process the following information that would be specific to an individual or entity:

- Bank Account ABA Routing Number
- Name of individual or entity
- Bank Account Number
- Bank Account Type
- 15 character field called detail unique id (this would typically represent something like an account number in the sending application)

3. Accuracy, Timelines, and Reliability

a. How will data collected from sources other than bureau records be verified for accuracy?

This component will not process from sources outside of Public Debt.

b. How will data be checked for completeness

The UA Component validates data types before accepting requests. Transactions are accepted in batches with each batch checked using a control total for number of records and total dollar amount. The sending applications are responsible for validating data.

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models.)

The UA application will process data that the transmission date has been reached and the effective date has not been passed. If stale data (effective date is passed) occurs it will be identified on a report as stale data.

d. Are the data elements described in detail and documented? If yes, what is the name of the document?

Detailed information about the data elements is not available.

Attributes of the Data

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

   Yes. The sending applications have requirements to disburse/collect funds via the ACH network.

2. **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

   No. UA will not derive new data. Specific payment requests may be broken down into multiple ACH records due to size limitations of the ACH network.

3. **Will the new data be placed in the individual's record?**
   No. This ACH data will be maintained by ACH processing date not at the individual account level.

4. **Can the system make determinations about employees/public that would not be possible without the new data?**

   Yes.

5. **How will the new data be verified for relevance and accuracy?**

   Verification of data is performed with the sending application.

6. **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

   The data is not being consolidated. Data from multiple applications is collected to UA, but each record is uniquely identified and linked to the sending application. Otherwise, standard Bureau of Public Debt application and infrastructure controls are in place to protect the data.

7. **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

   See above (#6).

8. **How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

   General processing will retrieve the data by a processing day and not by individual identifiers. Personal identifiers can be aggregated only when UA and

the sending application databases are queried together (recall the 15 character unique identifier data UA stores).

9. **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

   Summary reports will be generated by the system showing total counts with no individual identifying information. The ACH Returns for IAT (International ACH Transactions) report will list out the detail information received on the returned payment request. Access to this report is restricted by access controls on the Public Debt mainframe.

Maintenance and Administrative Controls

1. **If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

   The system will operate at one site.

2. **What are the retention periods of data in this system?**

   6 years, 7 months

3. **What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

   Disposal of data will be addressed in a future development effort for the UA component. This item will be placed in an internal tracking document for this application.

4. **Is the system using technologies in ways that the bureau/office has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

   No, technology use is consistent with components currently in use.

5. **How does the use of this technology affect public/employee privacy?**

   Not applicable. Protection of privacy remains unchanged. The technology use is consistent with components currently in use.

6. **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

   No.

7. **What kinds of information are collected as a function of the monitoring of individuals?**

   None.

8. **What controls will be used to prevent unauthorized monitoring?**

   Information stored in electronic media is safeguarded by automatic data processing security procedures in addition to physical security measures. For those categories of records stored in computers with online terminal access, the information cannot be accessed without the proper credentials.

9. **Under which Privacy Act SORN does the system operate? Provide number and name.**

   BPD .002--United States Securities (Savings-Type Securities)
   BPD .003--United States Securities (Other than Savings-Type Securities)

10. **If the system is being modified, will the Privacy Act SORN require amendment or revision? Explain.**

    Not applicable. This is a new system.

Access to Data

1. **Who will have access to the data in the system? (e.g., contractors, users, managers, system administrators, developers, others.)**

   Users of the sending applications will have access to data and reports via application interface with UA. Administrators and support personnel have access to perform support duties.

2. **How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

   This is primarily determined by the sending application. Within UA, data from multiple applications may be stored at the same time, but records are uniquely identified by the sending application. Standard Public Debt access procedures and controls are followed.

3. **Will users have access to all data on the system or will the user's access be restricted? Explain.**

   Users of applications that utilize UA will not have direct access to the UA database; they will only access the data via an application.

4. **What controls are in place to prevent the misuse (e.g., unauthorized browsing of data by those having access? (list processes and training materials.)**

   Public Debt has implemented suitable system, personnel and physical security measures to adequately protect the confidentiality and integrity of the information in the system.

5. **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, was Privacy Act contract clauses inserted in their contracts and other statutory and regulatory measures addressed?**

   No contractors were involved in the design or development of this application.

6. **Do other systems share data or have access to the data in the system? If yes, explain.**

   Yes.   Data from multiple sending applications is collected to UA, but each record is uniquely identified and linked to the sending application.

7. **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

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8. **Will other agencies share data or have access to the data in this system (e.g. Federal, State, Local, and Others)?**

   No. The ACH payment files will be transmitted to the FRB network.

9. **How will the data be used by the other agency?**

   Not applicable.

10. **Who is responsible for assuring proper use of the data?**

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