

Privacy Impact Assessment

Automated Timber Sales Accounting (ATSA) System

Cyber and Privacy Policy and Oversight

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Privacy Impact Assessment for the Automated Timber Sales Accounting (ATSA) System

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Abstract

The Automated Timber Sales Accounting system (ATSA) tracks payments for timber sales and produces billing information and Timber Purchasers' Statements of Account. ATSA also produces several managerial reports for use at local and national levels. Accounting information from ATSA is passed to the Foundation Financial Information System (FFIS). A review of the application, as installed by USDA FS, indicates that the ATSA system collects timber sale contract information from the Timber Information Management System (TIMS) to calculate and mail monthly bills to purchasers of national forest timber. This information includes the name, address, and tax id for the purchaser on each contract in the ATSA system.

Overview

The Automated Timber Sales Accounting system (ATSA) tracks payments for timber sales and produces billing information and Timber Purchasers' Statements of Account. The information collected enables the Forest Service to operate a billing and accounts receivable system in a systematic and efficient manner for the entire Agency. A secondary purpose for the information collection is to have the information in a centralized location so that it can be used for management purposes in a timely and efficiently manner.

TSA acts, primarily, as a batch program and is used to aggregate information from the Timber Information Management System (TIMS) for use by FFIS. ATSA accepts input from TIMS and sends a file used to update FFIS. Users cannot access ATSA directly; they are permitted only to submit data and retrieve reports. TSA reports are posted to the TSA Report Center website. Bills are posted to the Billing and Dunning website. ATSA does not have direct users.

ATSA interfaces with:

- Foundation Financial Information System (FFIS), passing timber bills and balance vouchers
- General Ledger to TSA (GLTSA) to receive lockbox data from the Bank of America
- Corporate Data Warehouse (CDW), passing produces timber cut and sold data monthly
- All Service Receipts (ASR) system for calculation of payments to states and grasslands each month
- Timber Information Management (TIMs) passing cut and sold reports quarterly
- TIMs to received TSA contract and permit initial sale information
- TSA Report Center web site to post TSA reports

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

ATSA does not directly collect any information from the customer. ATSA processes information from timber sales contracts entered in TIMS. Timber sales contracts may contain tax identification numbers, name, phone, and address information.

1.2 What are the sources of the information in the system?

.ATSA acts, primarily, as a batch program and is used to aggregate information from the Timber Information Management System (TIMS) for use by FFIS. ATSA accepts input from TIMS and sends a file used to update FFIS. Users can only submit data and receive reports. TSA reports are posted to the TSA Report Center website. Bills are posted to the Billing and Dunning website. ATSA does not have direct users.

1.3 Why is the information being collected, used, disseminated, or maintained?

The information collected within ATSA enables the Forest Service to operate a billing and accounts receivable system in a systematic and efficient manner for the entire Agency. A secondary purpose for the information collection is to have the information in a centralized location so it can be timely and efficiently used for management purposes.

1.4 How is the information collected?

ATSA does not directly collect any information from the customer. ATSA processes information from timber sales contracts that were entered in TIMS. Timber sales contracts may contain tax identification numbers, name, phone, and address information.

1.5 How will the information be checked for accuracy?

The data retained in the system is basically 'static.' Each Forest has access to their own data within TIMS while a contract is open and they are responsible for ensuring the accuracy of the data. Once a timber sale is closed, data is removed from the dbase and stored in a secure file within TSA that can only be accessed by the system administrators. Once validity of the data in has been verified no subsequent validation is necessary unless access to the system or its data has been compromised (i.e., security incident). ATSA does not verify the accuracy of the data beyond ensuring that it meets the field level formatting requirements.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

ATSA was implemented approximately 30 years ago in response to substantial number of congressional acts and laws, such as the Clarke-McNary Act and the National Forest Management Act, that regulate the management of forest products. ATSA was designed to meet these legislations as well as Federal contract laws that require the timely and efficient calculation of amounts due from the public based on the sale of forest products. ATSA aligns with the priorities and strategic goals of the agency and Department of Agriculture by providing and maintaining reliable financial management information and infrastructure, and delivering timely financial data for sound decision making. ATSA substantially complies with several federal policies and standards, most notably, the Office of Management and Budget (OMB) Circular A-127, Financial Management Systems, which prescribes policies and standards for executive agencies and departments to follow when managing financial systems.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

System roles have been established to control the level of access by a user. ATSA has no direct users so the roles associated with the application consist primarily of users with system/database responsibilities. Quarterly security certification of users is conducted to ensure that only the people who need access to the system are allowed access. All Forest Service employees and contractors are required to security awareness refresher training annually. Users with significant information system responsibilities are required to take additional role-based security training annually. ATSA data is passed to FFIS and is protected by security controls in place on the NITC and NFC GSS.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

Customer Data:

- Timber sale contracts and agreement information
- Permit information

Employee Data: None

Other Data (EERAs): None

Other Data (modules in the ATSA application): N/A

2.2 What types of tools are used to analyze data and what type of data may be produced?

N/A. No data analysis is performed within ATSA.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

N/A. ATSA uses data specific to Forest Service timber sales contracts.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

N/A. ATSA data is not accessible by external users and does not provide means by which data may be explicitly manipulated.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 How long is information retained?

The data on the mainframe includes fiscal yearend files for the past 32 years. The reports posted to the website for users are removed on a pre-defined schedule. Daily reports are available for 30 days. Monthly reports are rolled to a historical section of the website and maintained indefinitely. The website maintains approximately 4 years worth of data; microfiche files are available for TSA data greater than 4 years old.

3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

The ATSA document retention policy fully complies with the Forest Service's record retention guidance as well Federal contract law. The FS policy is NARA compliant.

3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

The data retained in the system is basically “static.” Each Forest has access to their own data while a contract is open and they are responsible for ensuring the accuracy of the data. Once a timber sale is closed, data is removed from the database and stored in a secure file that can only be accessed by the system administrators. Once validity of the data has been verified no subsequent validation is necessary unless access to the system or its data has been compromised (i.e. security incident).

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

ATSA interfaces with:

- Foundation Financial Information System (FFIS), passing timber bills and balance vouchers
- General Ledger to TSA (GLTSA) to receive lockbox data from the Bank of America
- Corporate Data Warehouse (CDW), passing produces timber cut and sold data monthly
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4.2 How is the information transmitted or disclosed?

The information is transmitted to FFIS each night via nightly batch file upload. The TSA information is not disclosed to any entities external to the Forest Service or the US Department of Agriculture.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

The batch file process is fully automated in order to minimize opportunities for human error. Access to data is restricted based on assigned system roles. Current roles in the system are:

- Read Only User

- Regional Approver
- System Administrator
- Security Administrator

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

N/A. ATSA does not share information with sources outside of the Department.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

N/A. ATSA does not share information with sources outside of the Department.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

N/A. ATSA does not share information with sources outside of the Department.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

N/A. ATSA does not share information with sources outside of the Department.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

ATSA is not responsible for direct data entry. The notification of individuals would occur with the TIMs environment.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

N/A This would be addressed as part of the establishment of the contract within TIMs. The data used within ATSA originates from TIMs.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

N/A This would be addressed as part of the establishment of the contract within TIMs. The data used within ATSA originates from TIMs.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

N/A This would be addressed as part of the establishment of the contract within TIMs. The data used within ATSA originates from TIMs.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 What are the procedures that allow individuals to gain access to their information?

N/A This would be addressed as part of the establishment and management of the contract within TIMs. The data used within ATSA originates from TIMs.

7.2 What are the procedures for correcting inaccurate or erroneous information?

N/A This would be addressed as part of the establishment and management of the contract within TIMs. The data used within ATSA originates from TIMs.

7.3 How are individuals notified of the procedures for correcting their information?

N/A This would be addressed as part of the establishment and management of the contract within TIMs. The data used within ATSA originates from TIMs.

7.4 If no formal redress is provided, what alternatives are available to the individual?

N/A This would be addressed as part of the establishment and management of the contract within TIMs. The data used within ATSA originates from TIMs. However, one alternative could be for users to direct concerns to the ASC-B&F Customer Support Staff at 1-877-372-7248.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

N/A This would be addressed as part of the establishment and management of the contract within TIMs.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

System roles have been established to control the level of access by a user. ATSA has no direct users so the roles associated with the application consist primarily of users with system/database responsibilities. Quarterly security certification of users is conducted. Security awareness training is required on an annual basis.

8.2 Will Department contractors have access to the system?

No. Access is limited to those FS personnel identified on the Segregation of Duties matrix.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

System roles have been established to control the level of access by a user. ATSA has no direct users so the roles associated with the application consist primarily of users with system/database responsibilities. Quarterly security certification of users is conducted. Security awareness training is required on an annual basis.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

A reaccreditation C&A is currently being conducted.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

The ISSO and System Owner review/analyze audit records on a monthly basis for indications of inappropriate or unusual activity, investigate suspicious activity or suspected violations, report findings to appropriate officials, and take necessary actions. An example of an unusual activity is anomalies regarding the day-to-day activity or too many logins to or logoffs from the system. Upon investigating unusual activity, findings will be reported up to the CFO if the System Owner deems it necessary. The level of audit monitoring and analysis activity within the information system is increased whenever there is an indication of increased risk to organizational operations, organizational assets, or individuals based on law enforcement information, intelligence information, or other credible sources of information. Increasing the level of audit monitoring and analysis is the responsibility of both the NITC Data Center and ATSA. The NITC Data Center has the responsibility of increasing the level of auditing, while ATSA has the responsibility of reviewing and monitoring the audit reports.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

ATSA mitigates risks to privacy essentially by limiting access to the system and by continuously monitoring the systems for inappropriate or unusual activity as described in the previous section.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

ATSA is a custom application developed in-house 30 years prior by the FS to receive input, process it in a batch file, and forward it to another system. Written in MVS COBOL using an S2K hierarchical database, and operated in batch mode daily, ATSA interfaces with other FS automated systems such as the Timber Information Manager (TIM), Regional Scales, and the Forest Central Accounting System. It also interfaces with the FS GL accounting system FFIS. The application runs on four separate but shared mainframe computers that are owned

and managed by the NITC Data Center in Kansas City, MO. These mainframes are IBM Complementary Metal Oxide Semiconductor (CMOS) systems running the Z/OS operating system. The mainframes, including the operating systems running on the mainframes, will not be part of the boundary of ATSA.

9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

ATSA does not use technology that could raise privacy concerns. It is a hierarchical database written in Enterprise COBOL.

Responsible Officials

Jeff Park
Program Manager
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Karren Alexander
System Owner
Phone: 703-605-5199

United States Department of Agriculture

Approval and Signature

I have carefully assessed the Privacy Impact Assessment for the

Automated Timber Sale Accounting
(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.



Karen Alexander
USDA Forest Service ATSA System Owner, _____ Date

/s/ Robert C. Chadderdon _____ 7/19/2010 _____
Robert C. Chadderdon
USDA Forest Service Acting Privacy Officer
CIO Information Security Branch
Date

E. Vanghn Stokes
USDA Forest Service Chief Information Officer _____ Date