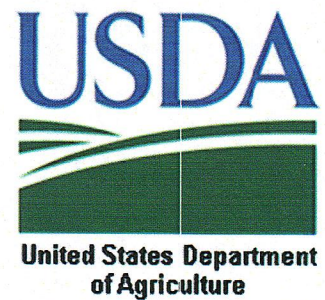


# Privacy Impact Assessment

Integrated Acquisition System (IAS) Major Application (MA)

- Version: 1.0
- March 2012
- OPPM PSD IAS MA





# Privacy Impact Assessment for the DM OPPM PSD IAS

March 2012

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## Abstract

The Departmental Management (DM) Office of Procurement and Property Management (OPPM) Procurement Systems Division (PSD) Integrated Acquisition System (IAS) Major Application (MA) is composed of an Oracle database, PRISM, and iProcurement software in addition to interconnections with Associate Chief Financial Officer for Financial Systems (ACFO-FS) Foundation Financial Information System (FFIS), ACFO-FS Financial Management Modernization Initiative (FMMI), Federal Procurement Data System–Next Generation (FPDS-NG) and Enterprise Content Manager (ECM).

The DM OPPM PSD IAS MA ensures that all procurement and financial data generated by any program or agency within USDA is contained in a single source with a standardized format for use in any procurement or acquisition processes.

The PIA is conducted to address storage of PII data and to comply with section 208 of the E-Government Act of 2002. This Privacy Impact Analysis has been prepared to update and document the DM OPPM PSD IAS MA.

## Overview

The IAS MA is owned by DM and is operated by OPPM and hosted at NFC. The DM OPPM PSD IAS MA is composed of an Oracle database, PRISM, and iProcurement software in addition to interconnections with ACFO-FS FFIS, ACFO-FS FMMI, FPDS-NG and ECM.

The overall purpose of the IAS is to solve several administrative business issues and to meet federal financial and acquisition requirements.

## 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?**

The IAS MA maintains vendors name, address and TIN.

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

The two sources of information are from ACFO-FS FMMI and ACFO-FS FFIS.

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

The IAS MA ensures that all procurement and financial data generated by any program or agency within USDA is contained in a single source with a standardized format for use in any procurement or acquisition processes.

**1.4 How is the information collected?**

The IAS MA collects information by exchanging information data with other agency interfaces.

**1.5 How will the information be checked for accuracy?**

The IAS MA does not check for information accuracy. It is the responsibility of the vendor to provide accurate information via the financial systems.

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

N/A- It is the responsibility of ACFO-FS FMMI and ACFO-FS FFIS to define the collection of information.

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

Access to the data in IAS MA is role-based and is done as a business needs to know basis. The back-end of IAS MA requires NFC VPN access and is also a business needs to know basis. The databases in IAS MA are encrypted.

## **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.**

The IAS MA ensures that all procurement and financial data generated by any program or agency within USDA is contained in a single source with a standardized format for use in any procurement or acquisition processes.

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

The IAS MA uses Hyperion tool to analyze data reports from the IAS MA.

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

The IAS MA indirectly takes data from Central Contractor Repository (CCR) through FMFI.

**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.**

Access to the data in IAS MA is role-based and is done as a business needs to know basis. The back-end of IAS MA requires NFC VPN access and is also a business needs to know basis. The databases in IAS MA are encrypted.

## **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?**

An archival strategy has not been implemented for IAS MA. The information is retained indefinitely.

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

An archival strategy has not been implemented for IAS MA. The information is retained indefinitely.

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

An archival strategy has not been implemented for IAS MA. The information is retained indefinitely in the online system database. Any risk associated with retention of this data over time is mitigated by limiting access to the data by authorized users who must have proper credentials to access the system. Data stored at the database level is highly encrypted and is not readable in the raw format. Database files on disk are encrypted and not readable at the OS level. Only authorized system administrators with proper credentials are authorized to access the file systems which are non-readable format.

## 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?

The IAS MA shares information only with Rural Development (RD) Enterprise Content Manager (ECM), ACFO-FS FDW, and FS Document Lookup Tool. The vendor codes are shared. The purpose of ACFO-FS FDW and FS Document Lookup Tool is for research and reporting. The purpose for ECM is invoicing.

### 4.2 How is the information transmitted or disclosed?

The information is transmitted through database link.

### 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.

Some vendor codes are TINs, but are data masked.

## 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?

The IAS MA does not perform external sharing of information to other organizations.

### 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.

The IAS MA does not perform external sharing of information to other organizations.

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

The IAS MA does not perform external sharing of information to other organizations.

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

The IAS MA does not perform external sharing of information to other organizations.

## **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?**

N/A- ACFO-FS FMMI and ACFO-FS FFIS are responsible of the information collected.

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

N/A- ACFO-FS FMMI and ACFO-FS FFIS are responsible of the information collected.

**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- ACFO-FS FMMI and ACFO-FS FFIS are responsible of the information collected.

**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- ACFO-FS FMMI and ACFO-FS FFIS are responsible of the information collected.

## 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?**

It is not the responsibility of the IAS MA to any information that is received from ACFO-FS FMMI and ACFO-FS FFIS.

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

It is not the responsibility of the IAS MA to correct inaccurate or erroneous information that is received from ACFO-FS FMMI and ACFO-FS FFIS.

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

It is not the responsibility of the IAS MA to notify individuals that their information is correct, information is received from ACFO-FS FMMI and ACFO-FS FFIS.

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

It is not the responsibility of the IAS MA to any information that is received from ACFO-FS FMMI and ACFO-FS FFIS.

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

It is not the responsibility of the IAS MA to any information that is received from ACFO-FS FMMI and ACFO-FS FFIS.

## 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?**



The IAS MA users complete a user profile request form titled the Corporate Systems Access Request Form (AD-1143) to verify his/her duty assignment, need-to-know and access privileges. Users obtain their manager's approval in the form of a signature when completing the Corporate Systems Access Request Form and submit the request to their Agency Security Administrator. The Agency Security Administrator reviews the access request form for appropriate access and may request additional documentation to ensure that access is being requested in a least-privileged manner. The System Security Administrator is the only person authorized to create IAS accounts and maintains a copy of all Corporate Systems Access Request Forms submitted for approval.

**8.2 Will Department contractors have access to the system?**

Yes

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

DM provides Security Awareness Training (SAT) to all DM users and Protecting Personal Identifiable Information (PII) training.

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

Yes, a Certification & Accreditation was conducted on 9/30/2010.

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

The technical safeguards for IAS MA users complete a user profile request form titled the Corporate Systems Access Request Form (AD-1143) to verify his/her duty assignment, need-to-know and access privileges. Users obtain their manager's approval in the form of a signature when completing the AD-1143 and submit the request to their Agency Security Officer. The Agency Security Officer reviews the access request form for appropriate access and may request additional documentation to ensure that access is being requested in a least-privileged manner. The Security Officer is the only person authorized to create IAS accounts and maintains a copy of all Corporate Systems Access Request Forms (AD-1143) submitted for approval.

The IAS MA automatically disables accounts after 90 days of inactivity, and alerts the necessary personnel of such an event.

**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?**

PSD follows the Account Management process and provides technical safeguards for IAS MA on how information is shared.

The technical safeguards for IAS MA users complete a user profile request form titled the Corporate Systems Access Request Form (AD-1143) to verify his/her duty assignment, need-to-know and access privileges. Users obtain their manager's approval in the form of a signature when completing the AD-1143 and submit the request to their Agency Security Officer. The Agency Security Officer reviews the access request form for appropriate access and may request additional documentation to ensure that access is being requested in a least-privileged manner. The Security Officer is the only person authorized to create IAS accounts and maintains a copy of all Corporate Systems Access Request Forms (AD-1143) submitted for approval.

The IAS MA automatically disables accounts after 90 days of inactivity, and alerts the necessary personnel of such an event.

## **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?**

The IAS MA ensures that all procurement and financial data generated by any program or agency within USDA is contained in a single source with a standardized format for use in any procurement or acquisition processes.

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

No, IAS MA does not employ technology that might expose privacy act information to multiple users.

## **Section 10.0 Third Party Websites/Applications**

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

**10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?**

Yes

**10.2 What is the specific purpose of the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR through FMMI.

**10.3 What personally identifiable information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications.**

N/A - The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMMI.

**10.4 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be used?**

N/A - The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMMI. The information is used for research, reporting, and invoicing.

**10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

N/A - The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMMI.

**10.6 Is the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

N/A - The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMMI.

**10.7 Who will have access to PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications?**

N/A - The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMFI.

**10.8 With whom will the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

N/A - The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMFI.

**10.9 Will the activities involving the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

Yes

**10.10 Does the system use web measurement and customization technology?**

N/A - The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMFI.

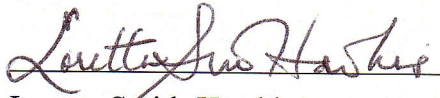
**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

N/A- The IAS MA does not use 3rd party websites and/or applications. The IAS MA indirectly takes data from CCR website through FMFI.

**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

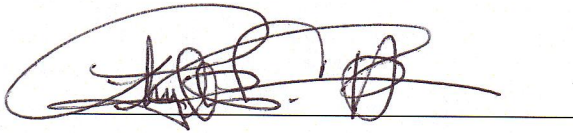
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## Responsible Officials



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Date



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## Approval Signature



Michael McGuire  
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