Privacy Impact Assessment

Automated Cash Reconciliation Worksheet System (ACRWS)

Revision: 1.2

Associate Chief Financial Officer for Financial Systems (ACFO-FS)

March 2010

Document Information

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1.0	February 2010	The Newberry Group, Inc.	Draft
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1 System Information

System Information	
Agency:	Associate Chief Financial Officer for Financial Systems (ACFO-FS)
System Name:	Automated Cash Reconciliation Worksheet System (ACRWS)
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	ACRWS is an automated cash reconciliation research tool that is used to aid in the daily and monthly reconciliation processes of USDA agencies' data to Treasury's Financial Management Service (FMS) data.
Who owns this system? (Name, agency, contact information)	Michael Clanton Associate Chief Financial Officer for Financial Systems 202-619-7636 Michael.Clanton@usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Scott Roy Information System Security Program Manager 504-426-5639 scott.roy@nfc.usda.gov
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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.	The information used in ACRWS includes USDA employee data, government and commercial vendor data, cash transactions and financial data. This data is used to aid in the daily and monthly reconciliation processes of USDA agency data to Treasury's Financial Management Service (FMS) data. Agency and mission area financial accountants utilize the system.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	☒ Yes ☐ 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 conversions from the 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.	☒ Yes ☐ No
4	Sources of the data in the system.	USDA agencies accounting transactions, and the Payroll Accounting System, US State Department, the Department of Health and Human Services (HHS) and the US Treasury data.
4.1	What data is being collected from the customer?	USDA agencies accounting transactions, and the Payroll Accounting System, US State Department, the Department of Health and Human Services (HHS) and the US Treasury data.
4.2	What USDA agencies are providing data for use in the system?	The source of USDA information for ACRWS comes from all of the USDA agencies accounting transactions, and the Payroll Accounting System.

No.	Question	Response
4.3	What state and local agencies are providing data for use in the system?	County and state based agencies associated with FSA, NRCS and RD.
4.4	From what other third party sources is data being collected?	ACRWS receives import data from the Department of State, the Department of Health and Human Services (HHS), and the U.S. Treasury Department.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	☒ Yes ☐ No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	ACRWS has a systems assurance process to ensure that data files transmitted from Department of State and HHS are complete. ACRWS relies on assertions from DoS and HHS that information is validated before transmission. There are a series of checks and edits that FFIS performs to ensure that all the data elements are in place in any incoming data. It also reconciles the number of records that were staged to process through with the number actually processed to ensure there is a match. This also ensures that the data shared with ACRWS is complete and accurate.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	There are a series of checks and edits that FFIS performs to ensure that all the data elements are in place in any incoming data. It also reconciles the number of records that were staged to process through with the number actually processed to ensure there is a match. This also ensures that the data shared with ACRWS is complete and accurate. For files inbound from outside USDA, a similar validation and verification is made on record counts.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	ACRWS has a systems assurance process to ensure that data files transmitted from Department of State and HHS are complete.

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?	The information used in ACRWS includes USDA employee data, government and commercial vendor data, cash transactions and financial data. See the data description in item number 3. Agency and mission area financial accountants utilize the system.
7	Will the data be used for any other purpose?	☐ Yes ☒ 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	☒ Yes ☐ No Explain- Research and reconciliation of cash transactions requires the specific entity for each transaction to be uniquely identified.
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.)?	☐ Yes ☒ No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	☐ Yes ☐ No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes ☐ 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?	Data is used to research and reconcile agency cash transactions.
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes ☒ No – If NO, go to question 12.
11.1	What are the other uses?	

No.	Question	Response
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?	☐ Yes ☒ No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	
13	Are processes being consolidated?	☐ Yes ☒ 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?	☐ Yes ☒ 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?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
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?	The data in ACRWS is imported data from other sources and remains unchanged in the system after going through the systems assurance processes.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	☒ Yes ☐ 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.)?	☐ Yes ☒ No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	☐ Yes ☒ No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	☒ Yes ☐ No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	The Disaster Recovery site is Backup Computing Facility (BCF), St. Louis, MO. Mirroring is used to provide data consistency and integrity. Reconciliation and validation is also done routinely.

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 have access to the data in the system based on job function and the need-to-know the information. They will be located throughout the agencies and the Office of the Associate Chief Financial Officer for Financial Systems (ACFO-FS). Sensitive information is restricted from users if there is no valid job-related need for the information to perform the duties of their position. The system developers have access to maintain the system databases and files for ACRWS. This requires that high-level access be given based on the job function. The systems developers also have appropriate access to view the data to ensure it is correct.

No.	Question	Response
		Access is only granted after appropriate background investigations have been completed for this sensitive position.
		USDA has a limited number of contractors that have access to ACRWS. Contractors undergo background checks before they are allowed to access any data within the system.
		Access to ACRWS is protected by authentication, encryption of passwords, and password aging. Security background investigations are required of all users and contractors. All users, including contractors, have had security briefings about system security rules and must sign a document confirming that they understand the rules.
		Access to other than USDA authorized sources is absolutely prohibited.
21	How will user access to the data be determined?	Once a user has completed the background investigation required for Federal employment or being a contractor to the Federal Government, then access is granted based on job function and the need-to-know principle. A user signs a document acknowledging that they have read and understand the system security rules before access is granted. This document is kept on file with an original signature. The Security Administrator assigns a role to the user based on their job functions after the request is signed by supervisor. These profiles have been set up to provide access to only the roles necessary to perform job functions.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☒ Yes ☐ No
22	How will user access to the data be restricted?	User Roles/Account Profile Matrix. A user's access will be restricted based on job function within the agency. A profile based on the user's ID within the system will determine what data the user can view. It is the responsibility of the user's supervisor and the Agency Security Administrator to ensure the proper paperwork is filled out and signed, and that the right profile is attached to the user.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes

No.	Question	Response
		☐ No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☒ Yes ☐ 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.)?	Agency Privacy Officers
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Since the data in ACRWS is a reflection of data from other sources and remains unchanged, anyone wanting to ensure their privacy rights are protected should contact the office or person responsible for the originating system (e.g., FFIS).
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?	☒ Yes – If YES, go to question 27. ☐ No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: ▪ 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)?	☐ Yes ☒ 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?	The agencies, the OCFO, users, managers, contractors, and functional and Security Administrators all have the responsibility to assure the proper use of the data. All data and reports are labeled for official use only, which requires a controlled environment and shredding when ready to destroy.

No.	Question	Response
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes ☒ 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?	☒ Yes ☐ No – If NO, go to question 31
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 social security number and name is not retrievable in the system. This information is retrievable through the online analytic processing tool and not ACRWS.
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) The system operates under the following SOR notices: 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
30.3	If the system is being modified, will the SOR require amendment or revision?	☒ Yes ☐ No

4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	☐ Yes ☒ 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 <u>Automated Cash Reconciliation Worksheet System (ACRWS)</u>

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   Date
OR Project Representative
OR Program/Office Head.

_____   _____

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

_____   _____

Agency OCIO   Date