



The Bureau of the Fiscal Service

Privacy Impact Assessment

The mission of the Bureau of the Fiscal Service (Fiscal Service) is to promote the financial integrity and operational efficiency of the federal government through exceptional accounting, financing, collections, payments, and shared services.

This Privacy Impact Assessment is a Public document and will be made available to the general public via the Fiscal Service Privacy Impact Assessment (PIA) webpage (shown below).

Fiscal Service - Privacy Impact Assessments (PIA):
http://www.fiscal.treasury.gov/fsreports/rpt/fspia/fs_pia.htm

Name of System: DATA Act Operating Infrastructure

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SYSTEM GENERAL INFORMATION:

1) System Overview: Describe the purpose of the system.

The Federal Funding Accountability and Transparency Act of 2006 (FFATA) required OMB to establish a free, publically accessible website containing data on federal awards and sub-awards. To meet these requirements, OMB launched USAspending.gov in December 2007. The Digital Accountability and Transparency Act (DATA Act) of 2014 enacted in May 2014 expanded FFATA and includes the additional requirement of disclosing of direct agency expenditures and linking federal contract, loan, and grant spending information to federal agency programs.

The DATA Act Operating Infrastructure leverages a cloud model. The DATA Act Operating Infrastructure will validate and process financial data files submitted by agencies, ensuring their accuracy. The DATA Act Operating Infrastructure will allow agencies to align their data to the Schema, identify and correct errors, validate file linkage, and submit data to the central data store that feeds the USASpending.gov site.

The DATA Act Operating Infrastructure Publication Website is added functionality and is a public website and API that presents reported agency financial information. All accessible data is public, and has been certified for publication in the DATA Act Operating Infrastructure.

The USAspending.gov Service Desk is a program support tool for the DATA Act Operating Infrastructure. Its purpose is to provide the capability for users to obtain help for issues through direct response by Service Desk agents, or browsing an FAQ for information about their issue. The Service Desk does not provide live, telephone support.

2) Under which Privacy Act Systems of Records Notice (SORN) does the system operate?

The Department of the Treasury/Bureau of the Fiscal Service (Fiscal Service) has developed this PIA to inform the public of the operational status of the DATA Act Operating Infrastructure. The purpose of DATA Act Operating Infrastructure is to provide the public with free access to data on federal awards and sub-awards. Some of the awardees are self-identified as sole proprietors. GSA did not recognize records/information about sole proprietors as personally identifiable information (PII) protected under the Privacy Act and Fiscal Service is temporarily accepting GSA's determination. However, the Fiscal Service has decided to undertake an independent review of the treatment of sole proprietor records and may, if appropriate, develop a Privacy Act system of records notice (SORN) for DATA Act Operating Infrastructure or modify an existing Fiscal Service SORN. These additional measures are aligned with guidance provided the Department of the Treasury for the treatment of Federal systems with PII as described under the Privacy Act.

3) If the system is being modified, will the SORN require amendment or revision?

yes, explain.

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no

4) Does this system contain any personal information about individuals?

yes

no

a. Is the information about members of the public?

No

b. Is the information about employees or contractors?

Yes, Sole Proprietors

5) What legal authority authorizes the purchase or development of this system?

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DATA in the SYSTEM:

1) Identify the category of individuals in the system

Check all that apply:

Employees

Contractors

Taxpayers

Others (describe)

2) Identify the sources of information in the system

Check all that apply:

Employee

- Public**
- Federal agencies**
- State and local agencies**
- Third party**

a. What information will be collected from employees or contractors?

Sole proprietor data- name, address, and email address.

b. What information will be collected from the public?

Name, email address.

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

All agencies that are required to comply with the DATA Act per OMB Policy.

d. What state and local agencies are providing data for use in the system?

Any state or local agency that is a recipient of federal funds.

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

Dunn & Bradstreet provides recipient info via the System for Award Management (SAM) at sam.gov.

3) Accuracy, Timeliness, and Reliability

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

The senior accountable officer (SAO) from each reporting agency will certify their data for accuracy.

b. How will data be checked for completeness?

Data will be validated for completeness against external systems of record including Government-wide Treasury Account Symbol Adjusted Trial Balance System (GTAS), System for Award Management (SAM), Federal Subaward Reporting System (FSRS) and the Federal Procurement Data System (FPDS).

c. What steps or procedures are taken to ensure the data is current?

Data is refreshed on a quarterly basis as required by law.

d. In what document(s) are the data elements described in detail?

All data elements are defined in the DATA Act Information Model Schema.

ATTRIBUTES OF THE DATA:

- 1) **How is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

The system is designed to implement the requirements of the DATA Act, as mandated by federal law. Sole proprietors, in order to do business with the federal government, agree to the terms and conditions of a contract, which governs the collection and use of personally identifiable information (PII).

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

Not applicable.

- 3) **Will the new data be placed in the individual's record?**

Not applicable.

- 4) **Can the system make determinations about employees or members of the public that would not be possible without the new data?**

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

- 8) **How will the data be retrieved? (If personal identifiers are used to retrieve information on the individual, explain and list the identifiers that will be used to retrieve data.)**

No personal identifiers are used by DATA Act to retrieve data. All data is received from agencies.

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

Reports can be generated on sole proprietor information, which may include an individual's name, and information about grants and contracts they have been awarded from the government. The general public will have access to these reports.

- 10) What opportunities do individuals have to decline to provide information (i.e., in such cases where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses)? How can individuals grant consent?**

Sole proprietors that are awarded grants and contracts from the government must register with the System for Award Management (SAM) at sam.gov, which includes their consent to publication of this information on both sam.gov and other systems re-using that information.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1) What are the retention periods of data in this system? How long will the reports produced be kept?**

Currently, the record retention capacity is unlimited, and the duration indefinite.

- 2) What are the procedures for disposition of the data at the end of the retention period? Where are the disposition procedures documented?**

Not applicable.

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

Not applicable.

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

No

- 5) How does the use of this technology affect employee or public privacy?**

Not applicable.

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

No

- 7) What kind of information is collected as a function of the monitoring of individuals?**

Not applicable.

8) What controls will be used to prevent unauthorized monitoring?

Not applicable.

ACCESS TO DATA:

1) Who will have access to the data in the system?

Check all that apply:

Contractors

Users

Managers

System Administrators

System Developers

Others (explain) Any member of the public _____

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

The data is available to the general public. Data is fed into the public site and API from the DATA Act Operating Infrastructure. DATA Act Operating Infrastructure uses OMB MAX to manage access, and only certain agency users that have been designated by their agencies as Senior Accountable Officials can certify and submit data to the DATA Act Operating Infrastructure and subsequently the public website.

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

Users will have read access to all data that has been certified and published by designated agency officials. Only data certified by agencies is available to the public. Public users do not have write access to any data in the DATA Act Operating Infrastructure.

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

This PIA addresses updates to the DATA Act Operating Infrastructure. Data that has been made available to the public by agencies cannot be altered, and can only be viewed.

5) If contractors are/will be involved with the design, development or maintenance of the system, were Privacy Act contract clauses inserted in their contracts and were other regulatory measures addressed?

Yes. Contractors must renew and acknowledge these clauses at least annually.

6) Do other systems share data or have access to the data in the system?

yes

no

If yes,

a. Explain the interface.

Not applicable.

b. Identify the role responsible for protecting the privacy rights of the public and employees affected by the interface.

Not applicable.

7) Will other agencies share data or have access to the data in this system?

yes

no

If yes,

a. Check all that apply:

Federal

State

Local

Other (explain) Any member of the public _____

b. Explain how the data will be used by the other agencies.

Not applicable.

c. Identify the role responsible for assuring proper use of the data.

Not applicable.