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: Integrated Document Management System Record Management (IDMS-RM)

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SYSTEM GENERAL INFORMATION:

1) System Overview: The Integrated Document Management System Record Management (IDMS-RM) is a document storage, retrieval and record management solution that primarily supports the operations of the Fiscal Service’s Debt Management Services. It also supports operations related to official inquiries within the Fiscal Service’s Office of Legislative and Public Affairs and the Judgment Fund.

2) Under which Privacy Act Systems of Records Notice (SORN) does the system operate? Provide number and name.
   Treasury FMS .014 Debt Collection Operations system

3) If the system is being modified, will the SORN require amendment or revision?
   __yes, explain.
   X no

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

   a. Is the information about members of the public?
      Yes
   b. Is the information about employees or contractors?
      No

5) What legal authority authorizes the purchase or development of this system?
   On April 26, 1996, President Clinton signed legislation known as the Debt Collection Improvement Act of 1996 (public Law 104-134). The Debt Collection Improvement Act (DCIA) requires Federal Agencies to refer debts to the Department of the Treasury in order to offset Federal Payments to collect delinquent debts owed to the Federal Government.

DATA in the SYSTEM:

1) Identify the category of individuals in the system
   Check all that apply:
   __ Employees
   __ Contractors
   _X Taxpayers
   _X Others (describe)
Categories of individuals covered in the IDMS-RM application include persons and businesses that owe delinquent debt to the Federal Government, persons and businesses that have won judgments against the Federal Government, and individuals that have sent correspondence to Federal legislators relating to a program, project, payment or debt managed by the Bureau of the Fiscal Service.

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?
   None directly. All information comes from other Fiscal Service systems.

b. What information will be collected from the public?
   None directly. All information comes from other Fiscal Service systems.

c. What Federal agencies are providing data for use in the system?
   Bureau of the Fiscal Service and all Federal Agencies that refer delinquent debts to DMS for collection.

d. What state and local agencies are providing data for use in the system?
   State agencies are providing data through the TOP system. This data is not received directly.

e. From what other third party sources will data be collected?
   None

3) Accuracy, Timeliness, and Reliability

a. How will data collected from sources, other than Fiscal Service records, be verified for accuracy?
   The information in IDMS-RM contains images of original documents and correspondence which are scanned into the system. The IDMS-RM prevents images from being altered by saving them in a read only format.

b. How will data be checked for completeness?
   N/A

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

d. In what document(s) are the data elements described in detail?
   The data elements are described in the IDMS-RM Security Plan.
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 data in use is both relevant and necessary for the purpose of fulfilling the Debt Collection Improvement Act of 1996.

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?
   No new data or previously unavailable data is created by the IDMS-RM through this aggregation. All data comes from other systems.

3) Will the new data be placed in the individual’s record?
   No new data will be created by the IDMS-RM.

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

5) How will the new data be verified for relevance and accuracy?
   No new data will be created by the IDMS-RM.

6) If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?
   Fiscal Service and IDMS-RM System security protects the data from unauthorized access and use.

7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? (Explain)
   IDMS-RM acts as a central repository for Fiscal Service information from TOP, FedDebt and other Fiscal Service functions, for storage, report generation and archiving of paper documents. Fiscal Service and IDMS-RM System security protects the data from unauthorized access and use. Users are only provided access based on their job function and a need to know basis.

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.)
   Data is retrieved by the documents index value. The index value is determined at the time the document is scanned and indexed. This could be the SSN, individual name, case number, etc.

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 on individuals can be produced based on taxpayer identification numbers, debt number, name and other criteria. These reports will be used to research information on the case. IDMS-RM users are restricted to only the functions they need for the performance of their duties.
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?
   Individuals do not have the ability to decline to provide 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 there are no retention guidelines in place. The data is retained indefinitely.

2) What are the procedures for disposition of the data at the end of the retention period? Where are the disposition procedures documented?
   Currently there are no retention guidelines in place. The data is retained indefinitely and stored in the IDMS-RM database.

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?
   Fiscal Service maintains consistent user of the system and data at all sites by user access control and adherence to standard operating procedures (SOPs). All IDMS-RM users are trained on their tasks based on the SOPs. Fiscal Service provides disclosure awareness, Privacy Act and Security training on the importance of data security.

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?
   N/A

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?
   Individuals are not monitored in IDMS-RM. However, the audit Trail report retrieves information on the user id, reference number and the timestamp of the queries performed by the user.

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

ACCESS TO DATA:

1) Who will have access to the data in the system?
   Check all that apply:
   _X_ Contractors
2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

All users are restricted to only the functions they need for the performance of their duties. For example, regular users cannot access the system audit logs. User level of access is authorized and reviewed regularly to ensure that user access does not exceed position requirements for all systems and applications. Risk levels are associated with job descriptions to determine access levels for the IDMS-RM application. Managerial approval is required before a user is granted access to functions within the IDMS-RM application.

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

IDMS-RM users are restricted to only the functions they need for the performance of their duties. For example, only a limited number of individuals associated with TOP have the highest level of access. Access rights are reviewed for continuing need at each level.

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)

The IDMS application management is committed to supporting least privilege and logical access control. IDMS application users are restricted to only the functions they need for the performance of their duties. Access rights are reviewed periodically to appropriate levels. In addition, IDMS users must consent to the disclosure agreement displayed when logged on before they can proceed to the main menu. IDMS users also must sign and submit to the IDMS Rules of Behavior to prevent unauthorized monitoring.

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?

IDMS-RM is a COTS application; however it is maintained by contractors. Privacy Act contract clauses are inserted into their contracts and they are required to take the Fiscal Service IT Security training and Disclosure training annually.

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

    __ yes
    _X_ no

If yes,

   a. Explain the interface.
   N/A
b. Identify the role responsible for protecting the privacy rights of the public and employees affected by the interface.  
N/A

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

__yes
X no

If yes,

a. Check all that apply:
   __ Federal
   __ State
   __ Local
   __ Other (explain) __________________

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

c. Identify the role responsible for assuring proper use of the data.
   The Fiscal Service, Information Owners and System Managers will be responsible for protecting the privacy rights of the individuals affected by the interface.