



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 - FMS Impact Assessments (PIA): <http://www.fms.treas.gov/pia.html>

Fiscal Service Privacy – Public Debt Impact Assessments
(PIA): http://www.treasurydirect.gov/privacy_impactassessment.htm

Name of System: *moveLINQ*
Document Version: *2.00*
Document Date: *July 1, 2013*

SYSTEM GENERAL INFORMATION:

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

Information in this system of records is collected and maintained to enable Relocation Services Branch personnel and authorized Bureau of the Fiscal Service (BFS) personnel to process relocation travel documents for Permanent Change of Station (PCS) and Temporary Change of Station (TCS) moves for government employees, both Treasury and Non-Treasury agencies.

2) Under which Privacy Act Systems of Records Notice (SORN) does the system operate? Provide number and name.

BPD.001 – Human Resources and Administrative Records

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? *Yes*

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

5 US.C.301; 31 US.C.3101, et seq.

DATA in the SYSTEM:

1) Identify the category of individuals in the system

Check all that apply:

Employees

Contractors

Taxpayers

Others (describe) *Family members of relocating employees and seller/purchaser documentation associated with residence transactions.*

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?

Information collected includes employee records relating to data required to create relocation obligations and payments. The Employee provides documents as receipts for reimbursement, some of these documents concern transactions they have had with the public, for example Real Estate Purchase/Sale Closing documents, which contain Personal Information on the public. Electronic images of these documents are stored within the moveLINQ application and can be retrieved by the applications users.

The application has the following data fields available to store the values collected:

- *Employee Name*
- *Employee Tax Identification Number (TIN)*
- *Employee Direct Deposit Information*
- *Employee Retirement Plan*
- *Employee Grade/Rank*
- *Employee Title (Current, New)*
- *Employee Current Home Address*
- *Employee Current Duty Station Address*
- *Employee New Home Address*
- *Employee New Duty Station Address*
- *Employee Phone Numbers (work, home, cell)*
- *Employee E-mail Address (work, personal)*
- *Employee Family – Names, Relationship, Birthdate*
- *Employee Salary Information*
- *Spouse Salary Information, if applicable.*
- *Employee Government Credit Card Number*

Examples of information on the public furnished by the employee and contained on electronic images stored within the application:

Buyer/Seller Residence Transaction Information

- *Name (both spouses)*
- *Current Address*
- *Property Address*
- *Purchase/Sale Price*
- *E-mail Address*
- *Phone Number*
- *Finance Company*
- *Loan Account Number*
- *Loan Information – Principle, payments, down payment, term, interest rate*

- *Insurance Company*

b. What information will be collected from the public?

NIA

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

The following Federal organizations provide data for moveLINQ:

- *Administrative Resource Center*
- *Alcohol/Tobacco Tax and Trade Bureau*
- *Armed Forces Retirement Home*
- *Bureau of the Public Debt*
- *Centers for Disease Control and Prevention*
- *Chemical Safety & Hazard Investigation Board*
- *Community Development Financial Institutions Fund*
- *Consumer Financial Protection Bureau*
- *Consumer Product Safety Commission*
- *Court of Appeals for Veterans Claims*
- *Department of Health and Human Services*
- *Department of Homeland Security – CIS*
- *Department of Homeland Security – OIG*
- *Department of Homeland Security-ICE (No new activity after 10/10/2008)*
- *Departmental Offices – Department of the Treasury*
- *Farm Credit Administration*
- *Federal Emergency Management Agency*
- *Federal Housing Finance Agency*
- *Federal Housing Finance Agency- OIG*
- *Federal Maritime Commission*
- *Federal Mine Safety & Health Review Commission*
- *Financial Crimes Enforcement Network*
- *Financial Management Service*
- *Food and Drug Administration*
- *Library of Congress (No new relocations since 2/2009)*
- *Merit Systems Protection Board*
- *National Archives and Records Administration*
- *National Science Foundation*
- *Occupational Safety & Health Review Commission*
- *Office of Financial Stability*
- *Office of Government Ethics*
- *Office of the Comptroller of the Currency (No new relocations since 5/2009)*
- *Office of Thrift Supervision (Converted to Office of Comptroller of the Currency)*
- *Railroad Retirement Board*
- *Special Inspector General for Troubled Asset Relief Program*
- *Treasury Inspector General for Tax Administration*
- *Treasury Office of Inspector General*

- *TRICARE Management Activity*
- *United States Mint*

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

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

Transportation service providers and relocation services companies under contract with our Bureau.

3) Accuracy, Timeliness, and Reliability

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

Data collected from sources other than customer agency component/employee records is verified for accuracy by Bureau personnel.

b. How will data be checked for completeness?

The system edits some fields to ensure the data has the correct type and number of characters, and is in the correct format. Other fields are checked running an external audit report that highlights errors that need to be corrected prior to processing.

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

Data contained on the "Request for Employee Relocation" form is received directly from the customer agency authorizing official. Data on the Employee Questionnaire is received directly from the customer agency employee.

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

The vendor provides a data dictionary document with each release that has updates from the previous version. This is stored on the network with the release notes. It outlines field name, table it is stored and format of the field and any audit checks performed by the application.

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?

Yes. Information in this system of records is collected and maintained to enable the Relocation Services Branch to create and process relocation travel documents, make payments and issue W-2 tax information.

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.

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

N/A

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

N/A

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

N/A

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

Information is contained in secure buildings or in area which are occupied either by officers and responsible employees of the Fiscal Service who are subject to personnel screening procedures and to the Treasury Department Code of Conduct or by agents of the Fiscal Service who are required to maintain proper control over records while in their custody. Additionally, since in most cases, numerous steps are involved in the retrieval process, unauthorized persons are unable to retrieve information in meaningful form. Information stored in electronic media is safeguarded by automatic data processing security procedures in addition to physical security measures. Moreover, for those categories of records stored in computers with online terminal access, the information cannot be accessed without proper credentials and preauthorized functional capability

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

Yes. Security controls are reviewed annually. If the system undergoes a change that would impact security, a new security assessment and authorization would be completed.

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 can be retrieved in a number of ways using a personal identifier. Information can be retrieved alphabetically by Employee ID (first 4 characters of the employee 's first name plus the last four digits of the employee's SSN and a two-digit incremental counter), Employee Last Name, Relocation Document Number or by Relocation Date.

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

General activity reports, agency requested reports, and W-2 and tax filings. Authorized Fiscal Service personnel and customer agency personnel will have access and use these reports. The reports are used internally for tracking and processing obligations, amendments, vouchers, invoices, and tax filings. Customer reports are typically used for recording and/or reconciling

activity and billings, management reporting and status discussions, and support for agency data request responses.

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?

The customer agency provides the Fiscal Service with a notice of an employee they have that is relocating; this notice will include contact information for the employee - name, phone numbers, and email address.

We contact the employee and provide them with a link to their agencies customer website; the site allows them to download fillable pdf forms. The forms are designed for that customer, if we have a contract with the customer to provide payments than we have forms that request banking information, and personal information necessary to report and pay both federal and state taxes on the employee 's behalf

All employees complete forms that contain Personally Identifiable Information for themselves and their dependents. This information is necessary to calculate and properly reimburse them for expenses they incur as part of the relocation.

This information is supplied voluntarily by the employee. We answer all questions concerning the relocation including disclosing why we need the information. The employee has the option to not disclose the information, it is explained to them how that would adversely affect the reimbursement of the expenses.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

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

The retention period for all relocation travel records, forms, legal papers and other related documentation is six years and three months from the date the relocation is closed.

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

At the end of the retention, period records are disposed of at varying intervals in accordance with records retention schedules reviewed, approved, and documented by the National Archives and Records Administration (NARA). Paper records ready for disposal are destroyed by shredding or maceration. Records in electronic media are electronically erased using accepted techniques.

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?

The system is only operated at one Fiscal Service site, a mirrored backup is maintained real time at a second Fiscal Service site.

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

Fiscal Service staff access the system using Bureau smart card technology.

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

This technology affords an extra layer of access security.

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

Yes. Information in the moveLINQ system of records is collected and maintained to enable ARC to process relocation travel, make payments, and issue W-2 tax information.

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

Information collected includes residence, employment, address, e-mail, fax, phone, and moving expense reimbursement information.

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

Information is contained in secure buildings or in area which are occupied either by officers and responsible Fiscal Service employees who are subject to personnel screening procedures and to the Treasury Department Code of Conduct or by agents of the Fiscal Service who are required to maintain proper control over records while in their custody. Additionally, since in most cases, numerous steps are involved in the retrieval process, unauthorized persons would be unable to retrieve information in meaningful form. Information stored in electronic media is safeguarded by automatic data processing security procedures in addition to physical security measures. Moreover, for those categories of records stored in computers with online terminal access, the information cannot be accessed without proper credentials and preauthorized functional capability.

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) Database Administrators

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

Access to the data by a user is determined by the individuals' management. Access for each user is limited to what they need to perform their job function. The procedure for user access is

controlled through the moveLINQ Access Control Procedure Attachment Q. Access is requested by management using Attachment L-moveLINQ Online Application request. Access changes are logged in the moveLINQ Access Control Log (example Attachment M). Access is controlled based on the role and the job functions performed by that role; Attachment NRoles and Permissions is reviewed annually as part of the Security Assessment Report review. Each Users access and role assigned to them is reviewed at least Bi-Annually as documented in Attachment O – Procedure for Bi-annual Check for the moveLINQ Access Control List.

Information is contained in secure buildings or in areas which are occupied either by officers and responsible employees of Fiscal Service who are subject to personnel screening procedures and to the Treasury Department Code of Conduct or by agents of Fiscal Service who are required to maintain proper control over records while in their custody. Additionally, since in most cases, numerous steps are involved in the retrieval process, unauthorized persons are unable to retrieve information in meaningful form. Information stored in electronic media is safeguarded by automatic data processing security procedures in addition to physical security measures. Moreover, for those categories of records stored in computers with online terminal access, the information cannot be accessed without proper credentials and preauthorized functional capability. Fiscal Service maintains documented procedures concerning controls and responsibilities regarding access.

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

User access is restricted. Safeguards are in place to only allow users of the system to have access to the data they need to perform their job duties.

Only authorized travel personnel and database administrators will have direct access to the data. In addition, appropriate data will be provided to the following third parties:

- *The Internal Revenue Services (IRS)*
- *The Social Security Administration (SSA)*
- *State Tax Departments*
- *Third-party vendors for the transportation and storage of household goods and airline reservations*
- *Home Sale Services vendors*
- *General Services Administration (GSA)*
- *Authorized customer agency personnel.*

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)

Controls include periodic Security Assessments, Continuous Monitoring, Rules of Behavior, Mandatory periodic Training, and Audit Trails/Logs.

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?

moveLINQ is a web-based Commercial Off The-Shelf (COTS) relocation software application that is internally hosted by Fiscal Service. The software contractor has no access to our data.

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

yes
 no

If yes,

a. Explain the interface.

Yes. The moveLINQ system provides accounting transaction data to the Fiscal Service core accounting system, Oracle Federal Financials.

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

All Fiscal Service employees who have access to information in a Privacy Act system are responsible for protecting personal information covered by the Privacy Act.

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) _____

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

Only authorized Fiscal Service personnel have access to the data in this system. Applicable tax data is provided to the Internal Revenue Service, Social Security Administration, and State Tax Departments. The General Services Administration and customer agencies personnel have indirect access to the data.

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

All Fiscal Service employees who have access to information in a Privacy Act system are responsible for protecting personal information covered by the Privacy Act.