



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: General Lockbox Network (GLN)

Document Version: 1.1

Document Date: April 18, 2017

SYSTEM GENERAL INFORMATION:

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

The General Lockbox Network (GLN) is a collection and processing service provided by certain financial institutions to help federal government agencies process paper checks and other remittance documents (not related to taxes) that are received through the mail. The GLN facilitates federal agencies check deposit and remittance information. The GLN has predominantly two types of lockboxes: Retail (low dollar, high volume remittances) and Wholesale (high dollar, low volume remittances). The services provided may range in complexity from the basic handling and processing of check and coupon to full agency document intake and complete data content management. Currently the GLN has three designated Financial Agents (FAs) to perform the lockbox work. Effective April 3, 2017, the GLN has designated a sole provider for the GLN services and will consolidate its operations to one Financial Agent. The GLN interfaces with the Electronic Check Processing (ECP) to convert paper checks into ACH transactions or Check 21 items via lockbox network. The ECP system is a repository of images of checks and remittances. It is a web-based client facing application used by Government Agencies and Financial Agents to view and research transactions.

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

FMS .017 Collection Records

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

yes, explain.

no

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

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?

31 U.S.C. 321
31 U.S.C. chapter 33
31 U.S.C. 3720

DATA in the SYSTEM:

1) Identify the category of individuals in the system

Check all that apply:

- Employees**
- Contractors**
- Taxpayers**
- Others: Members of the public**

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?

The information collected might contain identifying information such as individual's name, social security number, employer identification number, home address, employer's name and address; and bank account information such as bank account number, bank routing and credit card number.

b. What information will be collected from the public?

The information collected might contain identifying information such as individual's name, social security number, employer identification number, home address, employer's name and address; and bank account information such as bank account number, bank routing and credit card number.

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

Federal agencies may send payments and provide bank account information such as bank account number, bank routing number and payment amount. However, GLN does not track or maintain a complete list of which federal provide these payments.

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

State and local agencies may send payments and provide bank account information such as bank account number, bank routing number and payment amount. However,

GLN does not track or maintain a complete list of which states or local agencies provide these payments.

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

GLN does not collect data from other third party sources.

3) Accuracy, Timeliness, and Reliability

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

The Financial Agent has a dual-keying environment to ensure the check amounts and data scanned is accurate. Each transaction is balanced before moving to the next transaction. Rejects or unprocessable items are processed as specified in the individual federal agencies Statement of Required Services (SRS).

b. How will data be checked for completeness?

The Financial Agent (FA) follows the requirements as specified in the individual federal agencies Statement of Required Services (SRS) to ensure the data is checked for completeness.

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

The Financial Agent (FA) follows the requirements as specified in the individual federal agencies Statement of Required Services (SRS) to ensure the data is current.

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

The data elements are described in the individual federal agencies Statement of Required Services (SRS).

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?

All data is relevant and necessary because it allows the General Lockbox Network to support the Federal agencies revenue collection (not tax related) received through mail.

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?

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?**

User access is restricted based on pre-defined levels within the Financial Agent's system, and each individual user's role and job function.

In addition, recording capable devices such as smartphones, cell phones, cameras and tablets are not allowed on the processing floor, computer rooms, secured storage, and other areas deemed sensitive.

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

This service does not consolidate processes.

- 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.).**

The data is retrieved utilizing data associated with the payment processed this might include bank account number, payment date, payment dollar amount and the Item Reference Number (IRN).

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

This service does not have the capability to produce reports on individuals.

- 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 General Lockbox Network (GLN) is a collection and processing service provided by certain financial institutions to help federal government agencies process paper checks and other remittance documents (not related to taxes) that are received through the mail.

The General Lockbox Network (GLN) does not provide individuals the opportunity to decline to provide information. The GLN only collects information as describes in the "Statement of Required Services" for each federal agency partner. Allowing individuals to grant consent for the use of their information is not required for the GLN.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

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

Data retention periods vary and are established by the individual Federal agency in the Statement of Required Services (SRS). This service does not have the capability to produce reports on individuals.

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

The electronic data is automatically purged from the system at the end of the retention period established in the SRS. Disposition procedures are documented in the General Lockbox Security Guidelines (GLSG).

- 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?**

This service is operated in more than one site, but each site operates independently. Each Lockbox provider has their own site and processes unique sets of cashflows (business lines). Once the consolidation to one Financial Agent is completed, the sole provider will have two fully redundant sites.

- 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?**

The use of this technology does not affect employee or public privacy.

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

This service collects identifiable information such as individual's name, home address and social security number. However, the service does not have the capability to monitor individuals.

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

This service does not have the capability to monitor individuals.

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

This service does not have the capability to monitor individuals.

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)**

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

User access is restricted based on pre-defined levels within the system, and each individual user's role and job function.

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

No. User access is restricted based on pre-defined levels within the system, and each individual user's role and job function.

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)

Upon initial employment, Security Awareness Training is provided and repeated annually. The user access to the data is determined based on roles and responsibilities, and audit logs capture user activity to determine if misuse occurs.

In addition, recording capable devices such as smartphones, cell phones, cameras and tablets are not allowed on the processing floor, computer rooms, secured storage, and other areas deemed sensitive.

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. In addition, they are required to sign Non-Disclosure Agreements.

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

yes

no

If yes,

a. Explain the interface.

The GLN interfaces with the Electronic Check Processing (ECP) to convert paper checks into ACH transactions or Check 21 items via lockbox network. The ECP system is a repository of images of checks and remittances. It is a web-based client facing application used by Government Agencies and Financial Agents to view and research transactions.

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

All roles responsible for protecting the privacy rights of the public and employees affected by the interface.

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.

N/A

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

N/A