



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/fspia/fs_pia.htm

Name of System: Bank Management System (BMS)

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SYSTEM GENERAL INFORMATION:

1) System Overview:

The Bank Management System (BMS) serves as a mechanism for the collection and analysis of financial agent (FA) expenses by the U.S. Treasury's Bureau of the Fiscal Service (Fiscal Service), as well as for the processing of payments to those banks. BMS also serves as a repository of historical expenses for research purposes.

FAs access BMS on a monthly or otherwise regular basis and input the volume of activity associated with price codes for services provided by the FA. FAs may also input statistical or other non-expense related information into BMS (such as the breakout of expenses into development and operations). On the evening of the seventh business day of each month, BMS processes certain derived volumes based on data provided by the Collections Information Repository (CIR). CIR only sends transaction and deposit information associated with the Fiscal Service collection program and the ABA/RTN of the FA providing the service. No personally identifiable information or information about the public is transmitted from CIR to BMS. Also on the seventh business day, BMS runs a parameter check – a process that evaluates FA-reported volumes for excessively high or low values. The parameters are established by Fiscal Service and Federal Reserve personnel based on historical ranges of inputs. Starting on the 8th business day, Fiscal Service and Federal Reserve personnel conduct an analysis on FA inputs before initiating an approval process.

BMS provides users with various queries and reports related to payment and expense information. It provides budget-to-actual reporting and analysis. It accepts a feed from the Federal Reserve System's GEARS system, which provides all of the Federal Reserve program expenses. This data is used for reports, analytics, and the annual creation of the Agency Collections Expense Statement (ACES). The ACES is provided to all customer agencies to display their share of Fiscal Service's collections expenses. This information informs agency pricing and user fees for forms and other services related to collection of revenue.

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

Treasury/FMS.017 – Revenue Collection 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?

yes

no

BMS system user data is the only information in the system related to individuals. The system user data includes: name, office phone, and office email address. This information is used for the Fiscal Service and Federal Reserve operations staff to contact FA personnel to resolve expense reporting issues.

a. Is the information about members of the public?

Yes, BMS provides contact information for individuals acting in their professional capacity as users of the system, but access to that contact information is limited by role and access rights.

b. Is the information about employees or contractors?

Yes.

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

The following regulatory codes give the Fiscal Service the authority to develop and implement the BMS system:

12 U.S.C. 5018

This statute grants Financial Agent authority to Treasury. BMS is the tool used by the Fiscal Service to monitor and evaluate Financial Agent expenses.

12 U.S.C. 391

This statute grants Fiscal Agent authority to Treasury. The Fiscal Service has designated a Federal Reserve Bank to build and operate BMS under this authority. Federal Reserve program expenses are also provided to BMS for analytical purposes.

DATA in the SYSTEM:

1) Identify the category of individuals in the system

Check all that apply:

Employees

Contractors

Taxpayers

Others (describe)

Local Security Administrator (LSA) Role – The LSA manages users within their own organization. This allows them to create, disable, and reset passwords for their own users.

Financial Institution (FI) User – The FI User can report and view their expense information.

Fiscal Service User – **These users** manage users within their own organization. This allows them to create, disable, and reset passwords for their own users. They can also report expense

information, create adjustments, perform system maintenance, and approve Summary Expense Statement (SES) (payment) files.

Federal Reserve Bank (FRB) User – These users manage users within their own organization. This allows them to create, disable, and reset passwords for their own users. They can also report expense information, create adjustments, and perform system maintenance.

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?

Contact information solely in their professional capacity.

b. What information will be collected from the public?

BMS does not collect data directly from individuals of the general public. The only non-governmental people providing information to BMS are users of the system at financial institutions.

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

Only collections information associated to their agency locator codes (ALCs) are stored in this system. This information comes from the CIR system. Agencies do not have direct access to BMS, nor do they directly provide data to BMS.

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

No State or local agency provides data for use in BMS.

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

BMS interfaces with CIR, ARC, and the Federal Reserve System's GCD and GEARS systems.

3) Accuracy, Timeliness, and Reliability

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

- BMS has several Fiscal Service and FRB users that monitor expense reporting information input by FAs and transmitted from CIR. These users types are the
- Account Analyst
 - Manages the analysis of accounts at the detail level
 - Responsible for creating the SES

- Account Manager
 - Ensures accounts are reviewed, analyzed, and paid
 - Verifies payments
- FA program areas analyze FA metrics and performance data outside of BMS.
- Payment information is input into the Fiscal Service accounting system (Oracle), which is reconciled, tracked, and analyzed monthly by the program area that owns BMS.

b. How will data be checked for completeness?

- BMS has several Fiscal Service and FRB users that monitor expense reporting information input by FAs and transmitted from CIR. These users types are the
- Account Analyst
 - Manages the analysis of accounts at the detail level
 - Responsible for creating the SES
- Account Manager
 - Ensures accounts are reviewed, analyzed, and paid
 - Verifies payments
- Expenses are compared against program metrics on an ongoing basis by Fiscal Service program areas.
- Furthermore, the FAs have the incentive to ensure complete reporting because incomplete reporting would result in lowered compensation to them (i.e., if they do not report something, they cannot get paid for it).

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

FAs report monthly, or according to a regular schedule determined by the Fiscal Service. BMS also receives a monthly file on the 2nd business day of each month from the CIR for the previous month's data. BMS sends CIR a file containing new or updated profile information at the end of the day. Fiscal Service personnel also provide the information to CIR, TCMS, and OTCnet via email to ensure all stakeholders are informed and data is current.

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

All requirements are defined in use cases and within each use case is a field list describing the fields in the user interface. These fields correspond to database entries on the “back end” of the BMS 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?

All of the data collected by the system as previously detailed in this document are relevant and deemed necessary for the purpose of compensating FAss for the services

that they provide to the Treasury. FI and FRB expense data is necessary for proper program and project management.

- 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?**

No.

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

No.

- 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?**

N/A.

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

N/A.

- 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 by organization. User profile information is only accessible through the organization they are associated with.

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

Security reports. Only authorized users will be able to pull reports for people who they can access. The access is limited by role and permissions.

- 10) **What opportunities do individuals have to decline to provide information (i.e., 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 (Fiscal Service, FRB support staff, and FA users) with access to BMS utilize the system only in their professional capacity to perform work-related functions. The information collected is necessary, not voluntary and the consent option does not apply.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

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

BMS has a defined Retention Plan with different types of data being retained for different periods of time. The data within the database is defined to be kept for a total of 7 years with 18 months of those 7 years to be online and available offline for the remaining 5.5 years. As a result of a litigation hold, data will be kept offline indefinitely. When the litigation hold is lifted, the retention plan will take force.

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

The Retention Plan specifies that reports are kept for a minimum of 90 days but it could be longer and that each report specification document states how long the report should be retained.

- 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?**

BMS resides in the Treasury Web Application Infrastructure (TWAI) with one hot site and one backup site. Replication occurs between the two sites. The TWAI is responsible for replication of the data and failover to the back-up site in a contingency situation.

- 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?**

N/A.

- 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:

- Contractors
- Users
- Managers
- System Administrators
- System Developers
- Others (explain) _____

Fiscal Service users, and FA users who have appropriate levels of access and functionality may access the system. Also included is the FRB operations staff.

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

BMS uses role-based security to limit user access. The user provisioning system requires two individuals to grant user access.

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

Access is restricted and limited. The data accessible to users depends on their roles within the business process, as well as the level of access and functionality permitted to them as defined within the BMS system.

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)

BMS uses role-based security and applies least privileged access to limit user access to what is needed to perform their duties.

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?

The FRB was involved with the design and development of the system and they are acting as a fiscal agent with the appropriate agreements in place. FRB also employs contractors to assist with the development and they also sign agreements with confidentiality clauses and reference compliance to applicable laws.

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

- yes
- no

If yes,

a. Explain the interface.

b. Identify the role 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.

Although agencies do not have access to the system, BMS creates an annual report called the Agency Collections Expense Statement (ACES) for each agency. The reports are distributed via emails from Fiscal Service's agency liaisons. The reports do not contain any PII nor do they result in an intragovernmental funds transfer. The reports are to be used by agencies for evaluating the total cost to the government for generating revenue so that, for example, user fees or application fees are set at an appropriate amount.

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

Users have access to their own data and are responsible for the protection of that data. Otherwise, it is up to the ISSO to ensure proper security safeguards, and the FRB operations staff to ensure data quality. Specifically for the ACES, agency users will not have access to BMS, nor will the Fiscal Service agency liaisons. BMS program staff will create the reports for the agency liaisons. The agency liaisons will coach the agencies on how to use the reports.