



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

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Name of System: Debt Check

SYSTEM GENERAL INFORMATION:

1) System Overview:

The Debt Check system allows agencies and outside lenders to conduct a search of information extracted from the National Interactive Delinquent Debtor Database (NIDDD) to confirm whether potential recipients of Federal financial assistance owe delinquent non-tax debt to the Federal government for purposes of carrying out the law. The program also provides information as to whether potential recipients owe delinquent child support. Queries are submitted on-line by entering the last name and taxpayer identification number (TIN) of the loan applicant. If a delinquent debt is owed, the applicant would potentially be barred from receiving the loan, loan insurance or loan guarantee.

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

Privacy Act notice published by Treasury's Financial Management Service (see 65 Fed. Reg. 56612-01, Sept. 19, 2000).

.014 Debt Collection Operations System

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?

The information found in DebtCheck deals with any person who has a federally delinquent debt.

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

Federal law requires that people owing delinquent debt to the Federal government are barred from receiving Federal financial assistance in the form of loans, loan insurance, and loan guarantees. Documents 31 U.S.C. 3720B, 31 C.F.R. 285.13 and Presidential Executive Order 13019 established the foundation for the existence of the Debt Check application.

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?

None

b. What information will be collected from the public?

None

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

Federal agencies that are participating in TOP.

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

State and local Agencies do not provide data for use in Debt Check.

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

Other than input from TOP and output through web pages, there are no systems providing information to or receiving information from Debt Check.

3) Accuracy, Timeliness, and Reliability

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

There are no systems providing information to Debt Check other than TOP.

b. How will data be checked for completeness?

The data in Debt Check is extracted from TOP, therefore it will depend on TOP's methods of checking for completeness.

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

DebtCheck is updated nightly with current information from the TOP Database

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

The data elements are described in the Debt Check Security Plan, Section 1.9. Debt Check maintains data records that consist of a Federal delinquent debtor's taxpayer identification number (TIN) – which can be either a social security number (SSN) or an employee identification number (EIN) – along with the person's last name or the business entity's name. In addition, Debt Check maintains data pertaining to the creditor agency that submitted the delinquent debtor to the Treasury Offset Program. This information includes the agency's name, business address, and phone number.

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 purpose of DebtCheck is to bar federal delinquent debtors from acquiring additional federal debt. Debt Check matches the debtors if they currently possess federally delinquent debt. Debt Check not used to check credit worthiness and does not display data that would allow it to do so.

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, the Debt Check System retrieves information on individuals who have a Federal delinquent debt, as requested by the user.

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

No data will be created by the Debt Check system.

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?

The data is not being consolidated, the data comes only from the TOP database. The Bureau of Public Debt will manage controls to protect data from unauthorized access.

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

The data is not being consolidated, the data comes only from the TOP Database. The Bureau of Public Debt will manage controls to protect data from unauthorized access.

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 Debt Check user will enter a Taxpayer Identification Number (TIN) or Employee Identification Number (EIN) and Last Name or Business Name of the loan applicant to retrieve data.

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

Queries are submitted on-line by entering the last name or business name and taxpayer identification number (TIN) of the loan applicant. The lookup results provide debt match information on the delinquent debtor. The report provides the debt number, the agency the debtor has the debt with, and the agency point of contact. Non-FMS Federal government employees use Debt Check in a user role where they are limited to performing system inquiries.

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?

There is no person or entity providing information to Debt Check other than the Treasury Offset Program.

MAINTENANCE AND ADMINISTRATIVE CONTROLS:

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

Data is displayed as requested by the user and is not retained. Updated information is loaded nightly overwriting the data from the previous night.

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

N/A

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 in one site.

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

As of November 3, 2011, the system does not use any new technology that FMS has not previously employed. Plans are in place to use Smart Card credentials in the future.

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.

Debt Check offers intrusion detection (Tripwire host-based IDS), and NetIQ Appmanager for monitoring purposes. Audit Trail reports are performed through Infomaker.

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

The Audit Trail report retrieves information on the user id, reference number, and the time-stamp of the queries performed by the user.

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

The system administrator is the only role with the privilege to access to the Audit Trail. In addition, all Debt check users are required to electronically sign the Debt Check Rules of Behavior. The Rules of Behavior clearly specify that users must not browse or search FMS data except in the performance of authorized duties.

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) _____**

Users of the application are internal FMS employees acting as System Administrators, Security Administrators, System Users, also non-FMS Federal government employees working for agencies that issue Federal loans and/or loan guarantees and their designated lending partners.

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

Risk levels are associated with job descriptions to determine access levels for the Debt Check application. Managerial approval is required before a user is granted access to functions within the Debt Check application. Debt Check users are restricted to only the functions they need for the performance of their duties.

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

Non-FMS Federal government employees use Debt Check in a user role where they are limited to performing system inquiries only. This includes access to view all data, however they can add or change any data within the 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)

The Debt Check application management is committed to supporting least privilege and logical access control. Debt Check application users are restricted to only the functions they need for the performance of their duties. Accesses are reviewed periodically to appropriate levels. Debt Check users must agree to the disclosure agreement displayed when logged on before they can proceed to the main menu.

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?

Contractors were not involved with the design and development of the system or maintenance of the system

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

yes

no

Other than input from TOP and output through web pages, there are no systems providing information to or receiving information from Debt Check.

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.

Federal government employees working for agencies that issue Federal loans and/or loan guarantees and their designated lending partners can have access to the data in Debt Check.

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

Each federal agency is responsible for the proper use of data by their employees and designated lenders.