

Department of the Interior
Privacy Impact Assessment Template

May 28, 2014

Name of Project: Consolidated Financial System (CFS)
Bureau: Office of the Secretary
Project's Unique ID: 010-000000308

A. CONTACT INFORMATION:

Teri Barnett
Departmental Privacy Officer
Office of the Chief Information Officer
U.S. Department of the Interior
1849 C Street NW, Mail Stop 5547 MIB
Washington, DC 20240
202-208-1605

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

The Consolidated Financial System (CFS) does not contain personally identifiable information about individuals. The system contains high level accounting data from each of the Department's bureaus used to compile financial statements. The financial statements provided through CFS do not include sensitive financial data; the information provided includes a summary of financial balances for a given period used to compile the DOI's end of the year financial statements.

a. Is this information identifiable to the individual¹?

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).

¹ "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

The CFS does not contain information about individuals. CFS contains accounting data from each of the Department's bureaus used to compile financial statements.

b. Is the information about individual members of the public?

(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

The CFS does not contain information about individual members of the public. CFS contains accounting data from each of the Department's bureaus used to compile financial statements.

c. Is the information about employees?

(If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

No. CFS does not contain information about employees. The system only contains high level accounting data from each of the Department's bureaus used to compile financial statements.

2) What is the purpose of the system/application?

The CFS is a financial system that the Department and bureau finance offices use to prepare their annual audited financial statements in accordance with the Chief Financial Officers Act of 1990. In addition, the Department and bureaus use this system to submit required information to the Department of the Treasury and the Office of Management and Budget (OMB). The CFS directly supports the President's Management Agenda for improved financial performance and for expanded electronic government. The agenda includes an objective to "improve accountability to the American people through audited financial statements." This system allows the Department to efficiently and effectively report this financial information. More specifically, this system supports the Department's "management excellence" mission area. The CFS Information System (IS) functions as a web based application used by Bureau's finance offices, KPMG LLP, Office of Inspector General (OIG) and external clients to produce financial statements and perform financial analysis.

Bureau personnel are responsible for loading their monthly trial balances by the due dates set forth by the Office of Financial Management (PFM). The trial balances are extracted from the bureau's financial system. The trial balance files are the input to the system. The outputs are the various financial statements required by the OMB for each bureau. The PFM also provides consolidated financial statements for the Department.

3) What legal authority authorizes the purchase or development of this system/ application?

31 U.S.C. 3512, Executive Agency Accounting and Other Financial Management Reports and Plans; 5 U.S.C. 5701 et seq., Definitions; 330 Departmental Manual 3, DOI Financial Management/Accounting Organization; and Treasury Financial Manual.

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

There is no identifiable information on individuals in the CFS tool. The system is used to compile high level accounting data from the bureaus to generate the Department's end of the fiscal year financial statements. The type of reports the tool generates includes financial trial balances and chart of accounts.

2) What are the sources of the information in the system?

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

The source of accounting data is entered by each of the Department's bureaus by downloading the information from the Department's accounting system and uploading the information to CFS.

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

CFS is a financial accounting system for the Department of the Interior, which allows DOI bureaus to enter the bureaus' accounting data summarized to the level of the trial balance to produce the Department's end of the year financial statements. No other Federal agencies provide data for the CFS system.

c. What Tribal, State and local agencies are providing data for use in the system?

CFS is a financial accounting system that is used to compile non-sensitive financial data into the Department's annual financial report. Tribal, State, and local agencies do not provide data for use in the system.

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

CFS data is collected directly from the bureaus; data is not collected from other third party sources.

e. What information will be collected from the employee and the public?

CFS does not collect information from employees or the public.

3) Accuracy, Timeliness, and Reliability

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

Non-sensitive financial data is downloaded from the DOI's accounting system and uploaded directly to CFS. CFS does not collect information from any other source other than DOI's accounting system.

b. How will data be checked for completeness?

Data integrity reviews are conducted by the system administrators to ensure data in CFS is complete and accurate as appropriate.

c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Procedures are performed by each of the Department's bureaus specific to their business processes to ensure financial data is complete and accurate.

d. Are the data elements described in detail and documented? If yes, what is the name of the document?

No. DOI bureaus perform procedures specific to their business processes to ensure financial data is complete and accurate. The CFS system administrator does not maintain this information.

D. ATTRIBUTES OF THE DATA:

1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

CFS non-sensitive data is both relevant and necessary for compiling the Department's end of the year financial reports. Currently, CFS is only used to retrieve historical financial data stored within the tool.

- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

CFS does not collect or contain information about individuals, and does not derive new data or create previously unavailable information through aggregation. Currently, CFS is only used to retrieve historical financial data stored within the tool.

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

No, CFS does not collect or maintain information on individuals, and does not place new data on an individual's record. The data maintained in CFS is non-sensitive financial data. Currently, CFS is only used to retrieve historical financial data stored within the tool.

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

No, CFS does not collect or maintain information about individuals. The data maintained by CFS is non-sensitive financial data. Currently, CFS is only used to retrieve historical financial data stored within the tool.

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

CFS does not collect or maintain information on individuals and no new data will be entered into CFS. CFS is only used to retrieve historical financial data stored within the tool.

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

The CFS system does not maintain or consolidate PII data. The CFS contains non-sensitive historical financial data used by the Department's bureaus to produce financial statements.

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

This is not applicable to the CFS system as it does not consolidate data or processes. The CFS will be used to retrieve historical financial data stored within the tool, which is used by the bureaus to produce financial statements.

- 8) How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

CFS does not contain PII and does not use personal identifiers to retrieve information. CFS retrieves information by using the Retrieve reporting functionality within CFS which presents accounting data in a spreadsheet format summarized at the trial balance level.

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

CFS does not produce reports on individuals; the system contains non-sensitive DOI financial data used by bureaus to produce financial statements.

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), and how individuals can grant consent.)

This is not applicable as CFS does not collect or maintain information on individuals. CFS contains non-sensitive historical financial data used by bureaus to produce financial statements.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

CFS is maintained at one site at a secured DOI facility. Only authorized DOI personnel can access the data in CFS from within the DOI network.

2) What are the retention periods of data in this system?

Records are retained in accordance with Office of the Secretary Records Schedule 7151, Master Data Files, National Archives and Records Administration (NARA) Job Number N1-048-08-12. The disposition is temporary. Retention of records will be cut off at the end of the annual report cycle and destroyed or deleted 7 years after cut-off. This retention applies to data files unique to CFS, not to any user login information, system documentation, maintenance activities, security files, or other system records expected in a system.

3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Financial accounting records are disposed of in accordance with approved disposition methods. Paper records are shredded or pulped and electronic

records are erased or degaussed in accordance with 384 Departmental Manual 1 and NARA guidelines.

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

No. All technology used by CFS has been previously employed by the Department in connection with operations and maintenance of a financial reporting system.

5) How does the use of this technology affect public/employee privacy?

Use of the CFS system does not affect public or employee privacy as it does not collect or maintain any PII.

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

No. This is not applicable to the CFS system as it does not collect or maintain information on individuals. CFS contains non-sensitive historical financial data used by bureaus to produce financial statements.

7) What kinds of information are collected as a function of the monitoring of individuals?

None. This is not applicable to the CFS system as it does not collect or maintain information on individuals. CFS contains non-sensitive historical financial data used by bureaus to produce financial statements.

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

The CFS system does not contain PII so unauthorized monitoring of individuals is not possible. Only authorized users have access to the financial data contained in CFS. User privileges or restrictions are established and maintained by the CFS system administrator based upon the access rights authorized by the user's bureau security point of contact (SPOC). Bureau SPOCs review user access right reports on a quarterly basis to ensure the authorized user access, privileges, and restrictions are maintained as required.

9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

The CFS does not contain PII on individuals and is not a Privacy Act system of records.

10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

The CFS does not contain PII on individuals and is not a Privacy Act system of records.

F. ACCESS TO DATA:

1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)

Authorized DOI Government employees, contractors, and system administrators will have access to CFS.

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

Standard operating procedures governing user access is documented. Users access CFS using their active directory account credentials provided by DOI. User privileges or restrictions are established and maintained by the CFS system administrator based upon the access rights authorized by the user's SPOC. Bureau SPOCs review user access right reports on a quarterly basis to ensure the authorized user access, privileges, and restrictions are maintained as required.

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

Users are restricted to the financial data they are authorized to access. Access is granted by the user's SPOC who authorizes the level of access privileges or restrictions based upon the user's work requirements. The bureau SPOC requests access for each user through submission of a signed user access form to the CFS system administrator.

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)

User Access Controls. These controls include providing a unique user account (username and password) to each user. Access privileges or restrictions are authorized by the user's SPOC based upon the user's work requirements.

5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were

Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

No. The CFS includes commercial off the shelf (COTS) applications maintained as purchased. All design or development changes are provided by the application vendor in the form of software upgrade patches which are deployed by the CFS system administrator as made available by the vendor.

6) Do other systems share data or have access to the data in the system? If yes, explain.

No, the financial data in CFS is not shared with any other system. CFS contains non-sensitive financial data used to produce financial statements.

7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

Public and employee privacy is not affected as the CFS system contains non-sensitive financial data and does not contain PII.

8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other (e.g., Tribal))?

No other agency shares data or has access to the financial data in the CFS. The CFS is used by the Department of the Interior's authorized financial offices and bureaus to produce financial statements and submit required information to OMB and the Department of the Treasury.

9) How will the data be used by the other agency?

The CFS is used by the Department of the Interior's authorized financial offices and bureaus to produce financial statements and submit required information to OMB and the Department of the Treasury in support of improved financial performance and accountability through audited financial statements.

10) Who is responsible for assuring proper use of the data?

The CFS System Owner, Information System Security Officer, and bureau SPOC are responsible for the proper use of the data in the system.