



U.S. Department of the Interior

PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the DOI PIA Guide for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

Name of Project				Date	
Federal Financial System (FFS) Decommissioning				09-29-2016	
Bureau/Office			Bureau/Office Contact Title		
Financial Management Directorate (FMD)			Customer Support Branch		
Point of Contact Email	First Name	M.I.	Last Name	Phone	
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12201 Sunrise Valley Drive					
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Section 1. General System Information

A. Is a full PIA required?

Yes

Yes, information is collected from or maintained on

Federal personnel and/or Federal contractors

B. What is the purpose of the system?

The Federal Financial System (FFS) was a mainframe based commercial-off-the- shelf software (COTS) which provided a standardized, automated capability for performing administrative control of funds, general accounting, billing and collecting, payments, management reporting, and regulatory reporting. It consisted of a "core" system that supports primary financial accounting and reporting processes, and several optional modules/subsystems for specific operational and administrative management functions.

FFS is now decommissioned, with proper disposition of the software, hardware and data.

Software: FFS is a mainframe based commercial off the shelf software (COTS). The FFS software libraries for baseline CORE and DOI specific software libraries were copied onto on a 3580 magnetic cartridge tape. Each DOI bureau or organization was responsible for maintaining data based on required Financial system data retention methodology. Archived software and documentation for FFS would be stored offsite at the Federal Records Center (FRC), and the associated National Archives and Records Administration (NARA) Accession Number is: PT-048-2015-0096.

Hardware: FFS was used on the DOI mainframe, and there are no associated hardware to decommission.

Data: Each bureau or organization was responsible for maintaining data based on required Financial system data retention methodology. Some organizations relied on maintaining magnetic tape copies of the FFS monthly journals, stored at an off-site storage facility. Some bureaus chose to import the FFS legacy data onto in-house or agency maintained Oracle reporting databases, and other bureaus, including the Bureau of Land Management (BLM), Office of the Secretary and Departmental Offices, U.S. Geological Survey (USGS), Bureau of Indian Affairs (BIA), National Park Service (NPS), Fish and Wildlife Service (FWS), and Bureau of Reclamation (BOR) incorporated the legacy data into the Financial Business and Management System (FBMS). For further information of FBMS, please see the FBMS Cloud PIA.

FWS owns the FWS Data Warehouse (FFS DW) subsystem, which is no longer hosted in FFS and is being maintained separately by the DOI Office of the Chief Information Officer (OCIO) under a litigation hold for FFS data (Crab Orchard Site 14 Litigation Hold) as the reporting database contains the data necessary to support the litigation. FWS will conduct a separate PIA if required for any use or changes to the FFS DW.

C. What is the legal authority?

The Office of Management and Budget Circular A-127, Policies and Standards for Financial Management Systems. This Circular is issued pursuant to the Chief Financial Officers Act (CFSs Act) of 1990, P.L. 101-576 and the Federal Managers' Financial Integrity Act of 1982, P.L. 97-255- (31 U.S.C 3512 et seq.), and 31 U.S. C. Chapter 11.

D. Why is this PIA being completed or modified?

Retiring or Decommissioning a System

E. Is this information system registered in CSAM?

Yes

Enter the UJI Code and the System Security Plan (SSP) Name

010-000000315; Federal Financial System System Security Plan

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

Subsystem Name	Purpose	Contains PII	Describe
FFS Data Warehouse (FFS DW)	Reporting database populated nightly with current FFS data for reporting purposes.	Yes	The same PII is in the DW that is in the main application

G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?

Yes

List Privacy Act SORN Identifier(s)

FFS records are covered under DOI-90, Federal Financial System, system of records notice. DOI-90 will be retired upon completion of decommissioning procedures and disposal as appropriate. Records incorporated into FBMS are covered under DOI-85, Payroll, Attendance, Retirement, and Leave Records; DOI-86, Accounts Receivable: FBMS; DOI-87, Acquisition of Goods and Services: FBMS; and DOI-88, Travel Management: FBMS. DOI SORNs may be viewed on the DOI SORN page at <https://www.doi.gov/privacy/sorn>.

H. Does this information system or electronic collection require an OMB Control Number?

No

Section 2. Summary of System Data

A. What PII will be collected? Indicate all that apply.

- | | | |
|--|---|---|
| <input type="checkbox"/> Name | <input type="checkbox"/> Religious Preference | <input type="checkbox"/> Social Security Number (SSN) |
| <input type="checkbox"/> Citizenship | <input type="checkbox"/> Security Clearance | <input type="checkbox"/> Personal Cell Telephone Number |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Spouse Information | <input type="checkbox"/> Tribal or Other ID Number |
| <input type="checkbox"/> Birth Date | <input type="checkbox"/> Financial Information | <input type="checkbox"/> Personal Email Address |
| <input type="checkbox"/> Group Affiliation | <input type="checkbox"/> Medical Information | <input type="checkbox"/> Mother's Maiden Name |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Disability Information | <input type="checkbox"/> Home Telephone Number |
| <input type="checkbox"/> Biometrics | <input type="checkbox"/> Credit Card Number | <input type="checkbox"/> Child or Dependent Information |
| <input type="checkbox"/> Other Names Used | <input type="checkbox"/> Law Enforcement | <input type="checkbox"/> Employment Information |
| <input type="checkbox"/> Truncated SSN | <input type="checkbox"/> Education Information | <input type="checkbox"/> Military Status/Service |
| <input type="checkbox"/> Legal Status | <input type="checkbox"/> Emergency Contact | <input type="checkbox"/> Mailing/Home Address |
| <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Driver's License | |
| <input checked="" type="checkbox"/> Other | <input type="checkbox"/> Race/Ethnicity | |

Specify the PII collected.

FFS is now decommissioned and is no longer used to collect or maintain any data.

B. What is the source for the PII collected? Indicate all that apply.

- | | | | |
|---|--|---|---|
| <input type="checkbox"/> Individual | <input type="checkbox"/> Tribal agency | <input type="checkbox"/> DOI records | <input type="checkbox"/> State agency |
| <input type="checkbox"/> Federal agency | <input type="checkbox"/> Local agency | <input type="checkbox"/> Third party source | <input checked="" type="checkbox"/> Other |

Describe

FFS is now decommissioned and is no longer used to collect or maintain any data.

C. How will the information be collected? Indicate all that apply.

- | | | | |
|---------------------------------------|---|---|---|
| <input type="checkbox"/> Paper Format | <input type="checkbox"/> Face-to-Face Contact | <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input type="checkbox"/> Email | <input type="checkbox"/> Web Site | <input checked="" type="checkbox"/> Other | <input type="checkbox"/> Information Shared Between Systems |

Describe

FFS is now decommissioned and is no longer used to collect or maintain any data.

D. What is the intended use of the PII collected?

FFS is now decommissioned and is no longer used to collect or maintain any data.

E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.

- | |
|---|
| <input type="checkbox"/> Within the Bureau/Office |
| <input checked="" type="checkbox"/> Other Bureaus/Offices |

Describe the bureau or office and how the data will be used.

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

- | |
|---|
| <input type="checkbox"/> Other Federal Agencies |
|---|

- Tribal, State or Local Agencies
- Contractor
- Other Third Party Sources

F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?

No

State the reason why individuals cannot object or why individuals cannot give or withhold their consent.

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

G. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- Privacy Act Statement
- Privacy Notice
- Other
- None

H. How will data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

I. Will reports be produced on individuals?

No

Section 3. Attributes of System Data

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

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

B. How will data be checked for completeness?

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.

FFS records were maintained under Departmental Records Schedule DAA-0048-2013-0001-0011, which has been approved by NARA: Long-term Financial and Acquisition Records are cut off at end of fiscal year in which files are closed, and files can be destroyed 7 years after cutoff. The cutoff in this case will be the year in which the bureau customer data was migrated to FBMS or magnetic tapes were stored at offsite storage facility. Archived software and documentation are stored off-site according to FFS associated NARA Accession Number PT-048-2015-0096, which covers unclassified information in FFS.

Each bureau or organization has responsibility for maintaining data based on required Financial system data retention methodology.

E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?

FFS is now decommissioned and no longer maintains data. Each bureau or organization is responsible for maintaining and disposing of records based on records retention schedules and Financial system data retention methodology.

Approved disposition methods include shredding or pulping for paper records, and degaussing or erasing for electronic records, in accordance with NARA Guidelines and 384 Departmental Manual 1.

F. Briefly describe privacy risks and how information handling practices at each stage of the "information lifecycle" (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.

FFS is now decommissioned, with proper disposition of the software, hardware and data, as aforementioned. Financial data migrated from FFS into FBMS is protected through the administrative, technical and physical controls that have been implemented for FBMS and its hosting environment. Please see the FBMS Cloud PIA for analysis of privacy risk and mitigating privacy controls.

Section 4. PIA Risk Review

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

No

B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?

No

C. Will the new data be placed in the individual's record?

No

D. Can the system make determinations about individuals that would not be possible without the new data?

No

E. How will the new data be verified for relevance and accuracy?

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

F. Are the data or the processes being consolidated?

No, data or processes are not being consolidated

G. Who will have access to data in the system or electronic collection? Indicate all that apply.

Users

Developers

System Administrator

Contractors

Other

Describe

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

H. How is user access to data determined? Will users have access to all data or will access be restricted?

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?

No

J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

No

K. Will this system provide the capability to identify, locate and monitor individuals?

No

L. What kinds of information are collected as a function of the monitoring of individuals?

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

M. What controls will be used to prevent unauthorized monitoring?

Not applicable. FFS is now decommissioned and is no longer used to collect or maintain any data.

N. How will the PII be secured?

(1) Physical Controls. Indicate all that apply.

- Security Guards
- Secured Facility
- Identification Badges
- Combination Locks
- Key Cards
- Closed Circuit Television
- Safes
- Locked Offices
- Locked File Cabinets
- Cipher Locks
- Other

Describe

FFS is now decommissioned and is no longer used to collect or maintain any data. The DOI FFS customer bureaus migrated their data into FBMS, the Department-wide financial management system. Please see the FBMS Cloud PIA for analysis of privacy risk and mitigating controls.

(2) Technical Controls. Indicate all that apply.

- Password
- Intrusion Detection System (IDS)
- Firewall
- Virtual Private Network (VPN)
- Encryption
- Public Key Infrastructure (PKI) Certificates
- User Identification
- Personal Identity Verification (PIV) Card
- Biometrics
- Other

Describe

FFS is now decommissioned and is no longer used to collect or maintain any data. The DOI FFS customer bureaus migrated their data into FBMS, the Department-wide financial management system. Please see the FBMS Cloud PIA for analysis of privacy risk and mitigating controls.

(3) Administrative Controls. Indicate all that apply.

- Periodic Security Audits
- Regular Monitoring of Users' Security Practices
- Backups Secured Off-site
- Methods to Ensure Only Authorized Personnel Have Access to PII
- Rules of Behavior
- Encryption of Backups Containing Sensitive Data
- Role-Based Training
- Mandatory Security, Privacy and Records Management Training
- Other

Describe

FFS is now decommissioned and is no longer used to collect or maintain any data. The DOI FFS customer bureaus migrated their data into FBMS, the Department-wide financial management system. Please see the FBMS Cloud PIA for analysis of privacy risk and mitigating controls.

O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.

The FFS Information System Owner is responsible for oversight and management of the FFS and ensuring adequate security and privacy controls are implemented during the decommission process. The FFS Information System Owner and the FFS Privacy Act System Manager are responsible for ensuring adequate safeguards are implemented to protect individual privacy in compliance with Federal laws and policies for the use and decommissioning of FFS, and are responsible for addressing complaints or requests in consultation with DOI privacy officials. However, FFS is now

decommissioned and is no longer used to collect or maintain any data. DOI FFS customer bureaus migrated their data into FBMS, the Department-wide financial management system. The FFS system notice will be retired upon completion of decommissioning procedures. Please see the FBMS Cloud PIA for analysis of privacy risk and mitigating controls.

P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?

The FFS Information System Owner is responsible for oversight and management of the FFS security and privacy controls, and reporting any potential compromise or unauthorized access in accordance with Federal policy and established procedures. However, FFS is now decommissioned and is no longer used to collect or maintain any data. DOI FFS customer bureaus migrated their data into FBMS, the Department-wide financial management system. Please see the FBMS Cloud PIA for analysis of privacy risk and mitigating controls.