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PRIVACY IMPACT ASSESSMENT

Submit in *Word format* electronically to: Judy Hutt (hutt.judy@epa.gov)
Office of Environmental Information

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System Name: Compass Financials IT System (formerly the Financial System Modernization Project (FSMP))

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This project is in the following stage(s):

Definition   Development/Acquisition   Implementation

Operation & Maintenance **X**   Termination   Steady State   Mixed Life Cycle

I. Data in the System

1. Generally describe what data/information will be collected in the system.

 Compass includes accounts receivable, accounts payable, travel and HR data.

2. What are the sources and types of the information in the system?

Source systems for Compass include: the Payment Tracking System, EPA Acquisition System (EAS), Integrated Grants Management System (IGMS), ORD Management Information System (OMIS), PeoplePlus (PPL), Treasury lockbox transactions, Integrated Resources Management System (IRMS), and the property system. Compass contains personally identifiable information (PII) such as names, addresses, and Social Security numbers of persons indebted to or owed money by EPA. Compass also contains banking information such as the bank routing number and the bank account number. Input to Compass is passed through the system's edit/update process.

3. How will the data be used by the Agency?

The data is used to enter operating plans, perform reprogrammings, and support funds management activities; commit and obligate funds; record accounts receivable (including interest calculations, dunning functions, and cash receipts); record accounts payable (including interest, handling and penalty calculations and making automated disbursements); and record travel obligations, issue advances, and pay both the traveler and third party vendors.

4. Why is the information being collected? (Purpose)

The information is being collected to properly manage accounts receivable and accounts payable transactions, to ensure budgetary integrity and to establish financial control over those transactions.

II. Access to the Data

1. Who will have access to the data/information in the system *(internal and external parties)?* If contractors, are the Federal Acquisition Regulations (FAR) clauses included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)?

Only authorized users (EPA employees and contractors) that have had a proper background check have access to the system. Yes, the FAR clauses stated are included in the contract.

2. What controls are in place to prevent the misuse of data by those having authorized access?

Requests are made online using the Compass Online Access tool. The request needs to be approved by a supervisor and a coordinator. The requestor must select an Office/Region, Employee Type and Request Type. The requestor must also read the EPA Agreement and click the "I Agree" button.

3. Do other systems share data or have access to data/information in this system? If yes, explain who will be responsible for protecting the privacy rights of the individuals affected by the interface? (i.e., *System Administrators, System Developers, System Managers)*

Yes. We have established management agreements in the form of Memorandums of Understanding (MOUs) and Interconnection Security Agreements (ISAs) with the system owners/managers, who are responsible for protecting the privacy rights of the individuals affected by the interface.

4. Will other agencies, state or local governments share data/information or have access to data in this system? *(Includes any entity external to EPA.)*

No.

5. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the information? If yes, how is notice given to the individual? *(Privacy policies must clearly explain where the collection or sharing of certain information may be optional and provide users a mechanism to assert any preference to withhold information or prohibit secondary use.)*

No.

III. Attributes of the Data

1. Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed.

Compass supports the Agency's mission and goals through activities that capture and account for business event information, ensure budgetary integrity, and establish financial control over obligations and costs, performance, and other financial assets and information. In addition, Compass supports the activities that provide accurate and comprehensive financial data, including stewardship and operating performance information, and enable effective decision-making at all levels to support cost effective mission achievement and risk mitigation.

2. If data are being consolidated, what controls are in place to protect the data from unauthorized access or use? Explain.

Users of Compass and administrators must complete an access request form, which is then approved by a supervisor or control account manager and the corresponding security administrator. Users and administrators are only granted the privileges needed to perform their duties. Refer to the Internal Controls: Separation of Duties in Automated Financial Management systems within OCFO.

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

Yes. The data transmission in the EPA environment is protected by Managed Trusted Internet Protocol Services (MTIPS). There is also a VPN connection established between the EPA National Computer Center and to the CGIPhoenix Data Center on that connection which is FIPS 140-2 certified.

4. How will data be retrieved? Can it be retrieved by personal identifier? If yes, explain. *(A personal identifier is a name, Social Security Number, or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual.)*

Data can be retrieved using the person's name or the vendor code. Data cannot be retrieved using the ssn.

5. Is the Web privacy policy machine readable? Where is the policy stated? *(Machine readable technology enables visitors to easily identify privacy policies and make an informed choice about whether to conduct business with that site.)*

According to the Privacy Act Official, this question is being removed from the PIA. The web privacy policy was developed in compliance with applicable federal and Agency standards.

IV. Maintenance of Administrative Controls

1. Has a record control schedule been issued for the records in the system? If so, provide the schedule number. What are the retention periods for records in this system? What are the procedures for eliminating the records at the end of the retention period? *(You may check with the record liaison officer (RLO) for your AA-ship, Tammy Boulware (Headquarters Records Officer) or Judy Hutt, Agency Privacy Act Officer, to determine if there is a retention schedule for the subject records.)*

The record control schedule is #054. The retention period for electronic data is as follows: maintain individual records 6 years and 3 months after final payment. Records are not eliminated they are retired.

2. While the data are retained in the system, what are the requirements for determining if the data are still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

The only privacy data in Compass is the SSN/TIN and bank information. SSN comes from PPL for employees. TIN comes from Central Contractor Registration/System for Award Management (CCR/SAM) when connected. The SSN/TIN data is manually entered. As for bank information, the Accuity load file (to be implemented) will load the bank data from the file. Bank information can be manually added in the system as well.

All transactions, not just those with PII, are edited against the reference tables maintained by authorized staff. Transactions are edited against reference data in real time. A transaction with a data element not in the applicable reference table will be rejected. Access to update reference table data and process transactions is based on their Compass security profile. Security profiles must be approved by their supervisor and their security coordinator before access is granted.

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

No.

4. Does the system use any persistent tracking technologies?

No.

5. Under which System of Records (SOR) notice does the system operate? Provide the name of the system and its SOR number if applicable. A list of Agency SORs are posted at http://www.epa.gov/privacy/notice/. *(A SOR is any collection of records under the control of the Agency in which the data is retrieved by a personal identifier. The Privacy Act Officer will determine if a SOR is necessary for your system.)*

The system operates under SOR EPA-29.