

Copy PIA (Privacy Impact Assessment)

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Instructions


Review the following steps to complete this questionnaire:

- 1) Answer questions.** Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.
- 2) Add Comments.** You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.
- 3) Change the Status.** You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.
- 4) Save/Exit the Questionnaire.** You may use any of the four buttons at the top and bottom of the screen to save or exit the questionnaire. The button allows you to complete the questionnaire. The button allows you to save your work and close the questionnaire. The button allows you to save your work and remain in the questionnaire. The button closes the questionnaire without saving your work.

Acronyms

ATO - Authorization to Operate
CAC - Common Access Card
FISMA - Federal Information Security Management Act
ISA - Information Sharing Agreement
HHS - Department of Health and Human Services
MOU - Memorandum of Understanding
NARA - National Archives and Record Administration
OMB - Office of Management and Budget
PIA - Privacy Impact Assessment
PII - Personally Identifiable Information
POC - Point of Contact
PTA - Privacy Threshold Assessment
SORN - System of Records Notice
SSN - Social Security Number
URL - Uniform Resource Locator

General Information

PIA Name:	OS - DMCS - QTR2 - 2024 - OS2103300	PIA ID:	1931665
Name of Component:	OS - OS - OS - Debt Management and Collection System	Name of ATO Boundary:	Debt Management and Collection System
Overall Status:		PIA Queue:	
Submitter:		# Days Open:	20
Submission Status:	Submitted	Submit Date:	6/13/2024
Next Assessment Date:	N/A	Expiration Date:	7/2/2027
Office:		OPDIV:	OS
Security Categorization:		OpDiv PIA ID:	OS2103300
Legacy PIA ID:		Make PIA available to Public?:	No
1:	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
2:	Is this a FISMA-Reportable system?		Yes
3:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
4:	ATO Date or Planned ATO Date.		12/21/2021
5:	Is the system or electronic information collection, agency or contractor operated?		Agency

PTA

PTA		
PTA - 2:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA - 2A:	Describe in further detail any changes to the system that have occurred since the last PIA.	There have been no major changes since last time. This is being reviewed as part of the ATO renewal process.
PTA - 3:	Is the data contained in the system owned by the agency or contractor?	Agency

PTA - 4:

Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions.

HHS Program Support Center (PSC) is operating a debt collection center collecting HHS-related debts on behalf of the Department of the Treasury. The Debt Management and Collection System (DMCS) facilitates the outreach to individuals with delinquent debts and also collects debt. Debts are collected via a lockbox at Bank of America (BoFA). Collections are received by DMCS systems and operations staff logging on to Bank of America secure website, downloaded and processed into DMCS. The Bank of America system is not owned or operated by the government and does not have access to the DMCS system. Once the collections are available, they are automatically processed in our nightly DMCS batch processing. Some collections are received from Treasury and are transmitted to HHS/PSC via secure File Transfer Protocol (sFTP) and are processed in the nightly batch processing in DMCS as well. DMCS processes receivables due from the public to the HHS. The various debt types include student loan defaults, former employee salary overpayments, audit disallowance amounts and Medicare overpayments. There are different modules within the system - Pre-Claims Assistance (PCA), Health Education and Assistance Loan (HEAL), Cross Servicing (CROSS), Treasury Offset Program (TOP), and Breach of Contract (BOCDEBT). The modules within the DMCS system are all accessed through one single access point, a secure portal to the DMCS system hosted on a UNIX box at Triple-I. In order for anyone to access our Financial Systems you must first have an Active Directory network account created by IT Infrastructure & Operations-ITIO which includes remote Virtual Private Network (VPN) access. User will login to the Government Furnished Equipment (GFE) laptop using their Personal Identity Verification card and connect to the Endpoint Security Virtual Private Network to access the Debt Management Collection System.

PTA - 5:	List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.	<p>Information includes full name, Social Security number (SSN), physical address, and email contact information of the individuals or institutions that have defaulted on loans, and financial account information related to the debt concerning the key dates involved in the transactions resulting in the debt, as well as amounts of money owed. PII includes debtor contact information (SSN, name, address, phone number, email address) and financial account information (balance of debt, payments made) specifically related to the debt. The length of time data is stored on the system is 6 years and 3 months based on NARA guidelines.</p> <p>Submission is required, and HHS/PSC does not normally collect the information from the individuals, but from agencies referring the debt collection cases to the Program Support Center (PSC) Debt Collection Center (DCC). System users sign in via the DMCS security file that captures the username in journal transactions. The security file maintains access controls at the transaction level. The system must maintain a current non expired password to complete the login process. DMCS is not a public facing system. The only users of the system are employed by the federal government and must either be behind the HHS/PSC firewall or via VPN.</p>
PTA - 5A:	Are user credentials used to access the system?	Yes
PTA - 5B:	Please identify the type of user credentials used to access the system.	<p>HHS User Credentials</p> <p>HHS Username</p> <p>Password</p>
PTA - 6:	Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual.	<p>DMCS is an automated system that assists in tracking and processing loans and debts to HHS. These debts can be the result of defaulted grants, scholarships or loans provided for educational purposes; travel grants; allocated funds not used for the purposes they were given; separated employee debts; repatriation debts; Medicare overpay and Medicare secondary payor debts; grant and program disallowance debts; inspection debts; and many others. Each of these is tracked using a categorical code. Debtors may be either individuals or institutions. Historically, these programs were operated by the Department of Treasury alone, but now HHS was awarded the ability to pursue debts related to HHS-specific activities. DMCS provides comprehensive processing of a variety of unique debt management receivable and loan programs.</p> <p>This database is a feeder system to the official Program Support Center's accounting system of record, the Unified Financial Management System (UFMS). As an authorized Debt Collection Center for Department of Treasury, HHS/PSC employees use the information to aid in setting up repayment agreements to collect the debt owed to the government and maintain a current balance of the debt after money has been collected. DMCS stores the following PII: SSN (encrypted on the database),</p>

Debtor Name, Debtor Mailing Address, Debtor phone numbers, Debtor email address, and financial account information (specifically loan balance and payments made). This information is needed to facilitate debt collection and processing of that collection. Legislation: Debt Collection Improvement Act of 1996 & HHS Claims Collection Regulation 45CFR Part 30. System users sign in via the DMCS security file that captures the username in journal transactions. The security file maintains access controls at the transaction level. The system must maintain a current non expired password to complete the login process. PCA module collects debts from Sallie Mae and the Pennsylvania Higher Education Assistance Agency via Secure File Transfer Protocol (SFTP). Relevant information regarding the debt is entered into DMCS. 1, 30, and 90-day letters are sent from DMCS to notify individuals of the delinquency. Should the individual respond to the notice, payment arrangements are made. Payment arrangements are handled manually and updated in the system. In the event the individual does not respond, the debt is forwarded to the US Department of the Treasury for collection via SFTP. HEAL debts are referred to PSC from the Department of Education. Relevant information regarding the debt is entered into DMCS. 1, 30, and 90-day letters are sent from DMCS to notify individuals of the delinquency. Should the individual respond to the notice, payment arrangements are made. Payment arrangements are handled manually and updated in the system. In the event the individual does not respond, the debt is forwarded to the US Department of the Treasury for collection via SFTP. The CROSS and TOP modules are used to refer debts to the Department of Treasury when the PSC is unable to collect on the debt. These modules manage debts that remain delinquent after the 1, 30, and 90-day notices have been sent. If an individual does not respond to the debt notices, this program is responsible for sending the debts to the Department of the Treasury via SFTP. The Department of the Treasury does not have access to the system. There is a selection criterion based on the type of debt and the delinquency of the debt to determine if it is eligible to be referred to TOP. The debts are sent weekly to Treasury via sFTP. BOCDEBT is not used as frequently as the other modules and is no longer updated. It is strictly used for informational requests from lawyers and other individuals who request information about a defaulted loan. Typically, the lawyers represent individuals who are under bankruptcy. A file is sent to the lawyer.

PTA - 7:	Does the system collect, maintain, use or share PII?	Yes
PTA - 7A:	Does this include Sensitive PII as defined by HHS?	Yes
PTA - 8:	Does the system include a website or online application?	No
PTA - 8A:	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	

PTA - 9:	Describe the purpose of the website, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response.	
PTA - 10:	Does the website have a posted privacy notice?	
PTA - 11:	Does the website contain links to non-federal government websites external to HHS?	
PTA - 11A:	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
PTA - 12:	Does the website use web measurement and customization technology?	
PTA - 12A:	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	
PTA - 13:	Does the website have any information or pages directed at children under the age of thirteen?	
PTA - 13A:	Does the website collect PII from children under the age thirteen?	
PTA - 13B:	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 14:	Does the system have a mobile application?	No
PTA - 14A:	Is the mobile application HHS developed and managed or a third-party application?	
PTA - 15:	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
PTA - 16:	Does the mobile application/ have a privacy notice?	
PTA - 17:	Does the mobile application contain links to non-federal government websites external to HHS?	
PTA - 17A:	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
PTA - 18:	Does the mobile application use measurement and customization technology?	
PTA - 18A:	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
PTA - 19:	Does the mobile application have any information or pages directed at children under the age of thirteen?	
PTA - 19A:	Does the mobile application collect PII from children under the age thirteen?	
PTA - 19B:	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
PTA - 20:	Is there a third-party website or application (TPWA) associated with the system?	No
PTA - 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA

PIA - 1:	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	<p>Social Security Number</p> <p>Name</p> <p>Email Address</p> <p>Phone numbers</p> <p>Mailing Address</p> <p>Financial Account Info</p> <p>User Credentials</p>
PIA - 2:	Indicate the categories of individuals about whom PII is collected, maintained or shared.	<p>Business Partners/Contacts (Federal, state, local agencies)</p> <p>Employees/ HHS Direct Contractors</p> <p>Patients</p> <p>Members of the public</p> <p>Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)</p>
PIA - 3:	Indicate the approximate number of individuals whose PII is maintained in the system.	Above 2000
PIA - 4:	For what primary purpose is the PII used?	<p>The information is used to record and collect the receivables owed to the Government by the public. Information is shared with credit reporting agencies, collection agencies, debt collection services, the Department of the Treasury and the Department of Justice as part of the debt collection process. Information may also be shared pursuant to litigation or with the Internal Revenue Service (IRS) for tax-related enforcement. System users sign in via the Debt Management Collection System (DMCS) security file that captures the username in journal transactions. The security file maintains access controls at the transaction level. The system must maintain a current, non-expired password to complete the login process.</p>
PIA - 5:	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	<p>Information is shared with credit reporting agencies, collection agencies, debt collection services, the Department of the Treasury (DOT) and the Department of Justice (DOJ) as part of the debt collection process. Information may also be shared pursuant to litigation.</p>
PIA - 6:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	Unique identification of debtors and no alternative is available.

PIA - 6A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	Use of the SSN is explicitly authorized by the Debt Collection Improvement Act of 1996, Public Law 104-134 110 Stat. 1321. This Act amends Section 7701 of title 31, United States Code, by adding at the end the following new subsections: (c)(1) The head of each Federal agency shall require each person doing business with that agency to furnish to that agency such persons taxpayer identifying number. (2) For purposes of this subsection, a person shall be doing business with a Federal agency if the person is (A) a lender or servicer in a Federal guaranteed or insured loan program administered by the agency; (B) an applicant for, or recipient of, a Federal license, permit, right-of-way, grant, or benefit payment administered by the agency or insurance administered by the agency; (C) a contractor of the agency; (D) assessed a fine, fee, royalty or penalty by the agency; and (E) in a relationship with the agency that may give rise to a receivable due to that agency, such as a partner of a borrower in or a guarantor of a Federal direct or insured loan administered by the agency.'
PIA - 7:	Identify legal authorities governing information use and disclosure specific to the system and program.	Use of information and disclosure is explicitly authorized by the Debt Collection Improvement Act of 1996, Public Law 104-134 110 Stat.1321. Section (m)(1) of this law states: Section 3711 of title 31, United States Code, is amended by adding at the end the following new subsections: (g)(1) If a nontax debt or claim owed to the United States has been delinquent for a period of 180 days (A) the head of the executive, judicial, or legislative agency that administers the program that gave rise to the debt or claim shall transfer the debt or claim to the Secretary of the Treasury; and (B) upon such transfer the Secretary of the Treasury shall take appropriate action to collect or terminate collection actions on the debt or claim. However, further provisions permit the Secretary of the Treasury to delegate these responsibilities, in whole or in part, to any agency that maintains a debt collection capability, as HHS does. Several other sections of the document discuss information handling, including required and permissible actions related to computer matching, publication of debtor's names, and the implementation of the Privacy Act with reference to activities conducted pursuant to this law. Other provisions explicitly acknowledge the need for 'computer hardware and software, word processing and telecommunications equipment, and other equipment, supplies, and furniture' needed to carry out the requirements of debt collection.
PIA - 8:	Are records in the system retrieved by one or more PII data elements?	No
PIA - 8A:	Please specify which PII data elements are used to retrieve records.	Place holder

PIA - 8B:	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	Place holder
PIA - 9:	Identify the sources of PII in the system.	<p>Directly from an individual about whom the information pertains</p> <ul style="list-style-type: none"> Hard Copy Mail/Fax Email Online Other <p>Government Sources</p> <ul style="list-style-type: none"> Within the OPDIV Other HHS OPDIV Other Federal Entities <p>Non-Government Sources</p> <ul style="list-style-type: none"> Members of the Public Other
PIA - 10:	Is there an Office of Management and Budget (OMB) information collection approval number?	No
PIA - 10A:	Provide the information collection approval number.	Not Applicable, Program Support Center (PSC) does not collect information from the Public. Debts are referred to Program Support Center (PSC) from other agencies, Centers for Medicare & Medicaid Services (CMS), Dept. of Education, Indian Health Service (IHS), Central Payroll, Health Resources & Services Administration (HRSA) and others to collect the debt that individuals owe the government.
PIA - 10B:	Identify the OMB information collection approval number expiration date.	2/20/2026
PIA - 10C:	Explain why an OMB information collection approval number is not required.	Not Applicable, Program Support Center (PSC) does not collect information from the Public. Debts are referred to Program Support Center (PSC) from other agencies, Centers for Medicare & Medicaid Services (CMS), Dept. of Education, Indian Health Service (IHS), Central Payroll, Health Resources & Services Administration (HRSA) and others to collect the debt that individuals owe the government.
PIA - 11:	Is the PII shared with other organizations outside the system's Operating Division?	Yes
PIA - 11A:	Identify with whom the PII is shared or disclosed.	<ul style="list-style-type: none"> Other Federal Agency/Agencies Private Sector Within HHS

PIA - 11B:

Please provide the purpose(s) for the disclosures described in PIA - 11A.

Other Federal Agency/Agencies: Information is shared with credit reporting and collection agencies, debt collection services, the Dept. of the Treasury and the Dept. of Justice as part of the debt collection process. Information may be shared pursuant to litigation.

Private Sector: Per legal requirements, the Debt Management Collection System (DMCS) case information is shared with Transworld System and debtor info is referred to Dunn and Bradstreet. There is also a legal requirement to report individual debtors to the 3 credit reporting agencies.

Within HHS: The Service Level Agreement (SLA) with Centers for Medicare & Medicaid Services (CMS) is to process delinquent debts (180 days or older) owed from the general-public. The SLA with Department of Education (DOEd) is to process defaulted Health Education Assistant Loans (HEAL).

PIA - 11C:

List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).

Service Level Agreements (SLAs) with Administration for Children and Families (ACF), Administration for Community Living Politics, Medical Health Service (ACL), Agency for Health Research and Quality (AHRQ), Agency for Toxic Substances and Disease Registry (ARTSDR), Centers for Disease Control and Prevention (CDC), Centers for Medicare, Medicaid Services (CMS), Food and Drug Administration (FDA), Health Resources & Services Administration (HRSA), Indian Health Service (IHS), National Institutes of Health (NIH) Substance Abuse and Mental Health Services (SAMHSA), and Office of the Secretary (OS) to process debts owed from the public.

SLA with Defense Finance Accounting Service (DFAS) to process debts owed from separated employees and provide collection data.

SLA's with Treasury, Department Of Justice (DOJ) to process debt referrals and receive collection data. Contract with Transworld System Incorporated (TSI) to process collection agency referrals and receive collection data. Contract with Bank of America to receive Lockbox collection data for debtors in a repayment agreement. In banking, a lockbox is a service offered by commercial banks to organizations that simplifies collection and processing of account receivables by having those organizations' customers' payments mailed directly to a location accessible by the bank.

PIA - 11D:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	Activities related to accounting for disclosures are conducted consistently with the requirements of the Privacy Act 552a(c). Specifically, except for internal routine uses, HHS maintains the date, nature, and purpose of each disclosure, and the name and address of each person or agency to whom the disclosure was made. HHS retains this information for five years. Unless prevented by exemptions of the Privacy Act, HHS will make these records available to the individual named if requested; make corrections to the record if requested and appropriate, and inform recipients of the information of those correction
PIA - 12:	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
PIA - 12A:	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
PIA - 13:	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	There is no method for individuals to opt-out of the collection or use of their PII because the debtor voluntarily provided their PII when they initiated their agreement with the Federal Government to receive a loan, grant, scholarship or other financial assistance. Debtors that are placed in default of their agreement are submitted to PSC DMCS from the Federal Government entity that provided the funds to the debtor. All data associated with the debt, including PII, is forward to DMCS for processing.
PIA - 14:	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained.	Although PSC does not communicate with the debtor prior to the creation of the obligation, PSC believes that the agencies and programs it works with follow any and all requirements related to informing debtors of collection enforcement practices.
PIA - 15:	Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate. If no process exists, explain why not.	Debtors receive up to three due diligence letters providing them with an opportunity to address their debts. If the debtor responds to these letters and demonstrates that an error or inaccuracy, PSC will take steps to ensure the originating agency modifies their records appropriately, or that debt collectors receive updated information. In rare cases, individuals receiving due diligence letters can demonstrate that an error has been made. When this occurs, they are able to request corrections from credit bureaus.
PIA - 16:	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy. Please address each element in your response. If no processes are in place, explain why not.	The PII contained on the database is periodically reviewed as a routine part of the due diligence process. The timeliness, accuracy, and relevance of the data is updated because of correspondence from individuals (debtors), IRS notification, credit reporting agency corrections, and customer agency updates.

<p>PIA - 17:</p>	<p>Identify who will have access to the PII in the system.</p>	<p>Users Administrators Developers Contractors</p>
<p>PIA - 17A:</p>	<p>Select the type of contractor.</p>	<p>HHS/OpDiv Direct Contractors</p>
<p>PIA - 17B:</p>	<p>Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?</p>	<p>Yes</p>
<p>PIA - 18:</p>	<p>Provide the reason why each of the groups identified in PIA - 17 needs access to PII.</p>	<p>Users: Data inquiry and validation is required to properly record the defaulted or delinquent receivable. All users are direct users operating on behalf of the agency using agency credentials. Debt Management Collection System (DMCS) is not a public facing system.</p> <p>Administrators: System Administrators are required to access to all online and batch data to maintain appropriate access controls.</p> <p>Developers: Application and data maintenance requires access to all online and batch data to maintain and modify system specifications and trouble shoot error conditions.</p> <p>Contractors: The Program Support Center (PSC), Debt Collection Center (DCC) is required that certain debtors case information be referred to a private collection agency (TSI) to comply with specific legal requirements associated with the defaulted or delinquent receivable. The contractors are direct contractors operating on behalf of the agency using agency credentials.</p>
<p>PIA - 19:</p>	<p>Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>DMCS maintains levels of access depending on the user's role; the capacity exists to restrict type of access to read, edit or alter; System Administrator requires management authorization for adding or modifying users; Audit reviews are performed every six months of user access roles; User access is repealed upon reassignment or separation.</p>
<p>PIA - 20:</p>	<p>Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.</p>	<p>DMCS User Ids are systematically granted universal inquiry access to all Debtor case information in order to provide timely responses to authorized internal or external inquires. DMCS users are restricted to specific transaction update controls for separation of duties and responsibilities. For example, one user cannot establish a receivable and post a collection against the same receivable.</p>

<p>PIA - 21:</p>	<p>Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.</p>	<p>The HHS Office of the Secretary complies with the Federal Information Security Management Act's (FISMA) requirement that all agencies require all system users (employees and contractors) to be exposed to security awareness materials annually and prior to the employee's use of, or access to DMCS. Training includes Information Systems Security Awareness and Privacy Awareness Training.</p>
<p>PIA - 22:</p>	<p>Describe the training system users receive (above and beyond general security and privacy awareness training).</p>	<p>Access to training occurs online through the HHS Learning Portal for Department-mandated requirements such as System Security Awareness or Privacy Awareness Training. There is no additional classroom formal training or online training for application users. New users, however, are trained on the job by experienced Debt Management Branch personnel.</p>
<p>PIA - 23:</p>	<p>Describe the process and guidelines in place with regard to the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).</p>	<p>The PII contained on the database is periodically reviewed as a routine part of the due diligence process. The timeliness, accuracy, and relevance of the data is updated because of correspondence from individuals (debtors), IRS notification, credit reporting agency corrections, and customer agency updates. The data is retained indefinitely until the National Archives and Records Administration (NARA) retention schedules have been determined on how DMCS information will be maintained.</p>
<p>PIA - 24:</p>	<p>Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.</p>	<p>Technical and physical controls are in place to ensure the security of the information. These include an up to date System Security Plan, Contingency Plan, regular offsite backup of the data, and yearly security awareness training for all personnel. Also, the system is part of the yearly SAS-70 (Statement on Auditing Standards No. 70) audit which tests the adequacy and effectiveness of the operating controls</p>

Review & Comments

Privacy Analyst Review

OpDiv Privacy Analyst Review Status:	Approved	Privacy Analyst Review Date:	6/17/2024
Privacy Analyst Comments:	Vanessa, this PIA is ready for your review. All necessary questions have been answered. Thank you, Jon		Privacy Analyst Days Open:

SOP Review

SOP Review Status:	Approved	SOP Signature:	
SOP Comments:		SOP Review Date:	6/21/2024
		SOP Days Open:	8

Agency Privacy Analyst Review

Agency Privacy Analyst Review Status:	Approved	Agency Privacy Analyst Review Date:	6/24/2024
Agency Privacy Analyst Review Comments:	Reviewer: Crystal Bland 6/24/2024 This PIA is ready for SAOP review and approval. Please note for PIA-24, I put a comment about adding the administrative controls to the response on the next iteration of the PIA because we approved the previous PIA with that same response.		Agency Privacy Analyst Days Open:
			3

SAOP Review

SAOP Review Status:	Approved	SAOP Signature:	Archer Signature_Bridget Guenther.docx
SAOP Comments:	For PIA Q24: Please include the administrative controls on the next iteration of the PIA.	SAOP Review Date:	7/2/2024
		SAOP Days Open:	8

Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 24	BLAND, CRYSTAL	6/24/2024	Please include the administrative controls on the next iteration of the PIA.	

Admin Section

Is OpDiv Privacy Analyst Approved ?:	1	Is OpDiv Privacy Analyst Return ? :	0
		Is SOP Return ?:	0
Is Agency Privacy Analyst Approve ?:	1	Is Agency Privacy Analyst Return ?:	0
Is SAOP Approved?:	1	Is SAOP Return ?:	0
Total Approved:	4	Total Return:	0
Total Approval Required:	4		

Miscellaneous Fields

Last Updated:	7/2/2024 3:01 PM	History Log:	View History Log
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