

Office of the Comptroller of the Currency
Ensuring a Safe and Sound Federal Banking System for all Americans.

Management and Accountability Reporting Tools (\$SMART)

Privacy Impact Assessment (PIA)

Version 1.7

April 28, 2014

Prepared by:

Security & Compliance Services (SCS)

DOCUMENT CHANGE CONTROL

VERSION	DATE	SUMMARY OF CHANGES	NAME
1.2	11/05/2012	Update /Review of Document	Alejandro Poppi
1.3	04/24/2013	Update to reflect HQ relocation and update to system environment	Karee Payton
1.4	06/24/2013	Updated to reflect platform upgrade	SCS\S. Vasanth
1.5	02/10/2014	Update to CISO/CPO information	SCS/V. Curtis
1.6	2/18/2014	Updated PeopleTools version	Anujit Basu
1.7	4/28/2014	Update of ISSO and System Administrators	Violet Curtis

NOTE

This document was prepared in support of the system's Security Assessment & Authorization effort. The document was developed in accordance with, or following the guidance contained in, the following:

- *The Privacy Act of 1974* (Public Law 92-132, 5 U.S. C. 552a).
- *Federal Information Security Management Act of 2002* (Title III of P.L. 107-347).
- Section 208 of the *E-Government Act of 2002* (Public Law 107-347, 44 U.S.C. Ch 36), April 17, 2003.
- Office of Management and Budget (OMB) Memorandum M-03-18, *Implementation Guidance for the E-Government Act of 2002*, August 1, 2003.
- OMB Memorandum M-03-22, *OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*, September 26, 2003.
- OMB Memorandum M-06-15, *Safeguarding Personally Identifiable Information*, May 22, 2006.
- OMB Circular No. A-130, Revised, (Transmittal Memorandum No. 4): *Management of Federal Information Resources*, 28 November 2000.
- Computer Matching and Privacy Act of 1988 (Public Law 100-503).
- Department of the Treasury Publication, TD P 25-05, *Privacy Impact Analysis Manual*, dated July 2006

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PRIVACY IMPACT ASSESSMENT

1. SYSTEM IDENTIFICATION

1.1 Name of System, Project, or Program:

The official system name:

SMART (Management and Accountability Reporting Tools)

1.2 Responsible Organization:

Office of the Chief Information Officer (OCIO)
Office of the Comptroller of the Currency (OCC)
400 7th Street, SW
Washington, DC 20024

1.3 Information Contact(s)

Names of persons knowledgeable about the system, the system and data owner, security personnel, etc:

Key System Contacts (include name, phone, and email):

See PTA (Privacy Threshold Analysis) document.

1.4 Security Categorization

The system was assessed in its Security Categorization Report (SCR) as **MODERATE** under guidance contained in Federal Information Processing Standards (FIPS) Publication (PUB) 199, *Standards for Security Categorization of Federal Information and Information Systems*, December 2003, as follows:

Table 1-4: Security Categorization Summary

Information Type	Confidentiality	Integrity	Availability
Capital Planning	Low	Low	Low
Budget Execution	Low	Low	Low
Debt Collection	Moderate	Low	Low
User Fee Collection	Low	Low	Moderate
Official Information Dissemination	Low	Low	Low
Income	Moderate	Moderate	Moderate
Personal Identity and Authentication	Moderate	Moderate	Moderate
High Water Mark	MODERATE		
CATEGORIZATION	MODERATE		

1.5 System Operational Status

The current operational status of the SMART system is: Operational.

1.6 General Description/Purpose

SMART is a commercial off the shelf (COTS) application customized for the OCC and is based on PeopleSoft Financials version 8.9. This application supports a variety of Financial Management (FM) functions including billing, general ledger, accounts payable, accounts receivable, asset tracking, depreciation, financial statements, budgeting, requisitions, procurement activities, reports, and commitment control. SMART also includes Retiree Billing System (RBS), Expense Reports Online (ERO), and Assessment processing. SMART reports vary by job function: accounts payable reports, budget reports, financial statements, accounts receivable reports, and asset management reports. The system is only accessed and used by OCC internal user groups (OCC employees and contractors).

Technical details are on file.

Figure 1-1, SMART System Diagram

1.7 System Environment

SMART is an enterprise-level system and is supported by the Network Infrastructure General Support System (NI-GSS) hosted at the OCC Ashburn Data Center.

Production Platform

The Production Platform is utilized by FM to conduct official OCC financial transactions. This platform includes the Production versions of the SMART PeopleSoft System, which are required to complete daily transactions.

Reporting Platform (Production)

The Reporting Platform is used by FM to generate daily reports at the Production level. The use of a separate and static database in this platform allows for a standard set of data for all users and faster performance. The Reporting Platform is also used for nVision reporting, specifically Web nVision.

8.9 Development Platform

The Development Platform is the principle environment for developing and testing customizations to the delivered 8.9 PeopleSoft product. It is also used for the 8.9 Release testing and User Acceptance testing. The Development Platform mimics the setup of the Production Platform but also includes the Microsoft Office/nVision Scheduler server for Version 8.9.

1.8 Changes to SMART

PeopleTools version was upgraded from 8.49.33 to 8.52.11 in June 2013. The latest patch applied is PeopleTools 8.52.19 in February 2014.

1.9 System Interconnection/Information Sharing

SMART system interfaces play an important role in OCC daily business. Currently, there is a variety of interfaces. The SMART interfaces are:

Technical details are on file.

These interconnections are shown in the following figure.

Technical details are on file.

Figure 1-7, SMART Interconnections

2. PRIVACY IMPACT ASSESSMENT

2.1 Privacy Assessment

The following paragraphs detail the Privacy Assessment applicable to the *SMART*.

2.1.1 Does this system collect any personal information in identifiable form about individuals?

Yes No

2.1.2 Does the public have access to the system?

Yes No

2.1.3 Has a PIA been completed in the past?

Yes No

2.1.4 Has the existing PIA been reviewed within the last year?

Yes No N/A

2.1.5 Have there been any changes to the system since the last PIA was performed?

Yes No N/A

2.2 Data in the System/Application

2.2.1 What elements of PII are collected and maintained by the system?

Information such as individuals' names, home addresses, and bank account numbers (for purposes of direct deposit) are held within SMART.

2.2.2 Why is the information is being collected?

Required by Financial Management Services for payment.

2.2.3 What are the sources of the information in the system?

All information is collected via OCC personnel records and via the interfaces described above.

2.2.4 How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?

Some Privacy information is received from the banks. Per MOUs/ISAs, the banks have the responsibility for establishing the accuracy of information they supply and for proper formatting the transmittal to SMART. SMART then checks for format errors and then loads into the database.

2.2.5 Who will have access to the data and how is access determined?

Only the OCC's employees and contractors that have been authorized will have access to SMART data. Access is determined based on each individual's job role. A user's request for a SMART data access role must be approved by that individual's supervisor. There is a predefined set of access roles for which specific access permissions are allocated.

2.2.6 Describe the administrative and technological controls that are in place or that are planned to secure the information being collected.

All management, operational, and technical controls in place and planned for SMART are described in the System Security Plan, which must be approved in writing by various SMART management officials.

2.2.7 What opportunities will individuals have (if any) to decline to provide information or to consent to particular uses of the information?

Individuals have ability to decline providing privacy information at the system entry points which are: Citibank and SATO. These entry points have the responsibility to provide the individual with the opportunity to decline providing information. If they do not decline at the entry system, then SMART will use the privacy information where needed. No other opportunities are provided by SMART for declining.

2.2.8 What is the life expectancy of the data and how will it be disposed of when it is no longer needed?

The current life expectancy of the data is currently 7 years. Once the size reaches a point where disposition must be addressed, then SMART will dispose of information in agreement with federal regulation for financial information.

2.2.9 Is the system owned, operated, and maintained by a contractor?

Yes No

2.3 System of Records (SOR) Notice

Does the collection of this information require a new system of records under the Privacy Act (5 U.S.C. § 552a) or an alteration to an existing system of records?

Yes No

2.4 Security Assessment and Authorization

Has the system been assessed and authorized within the last three years?

Yes No

Date ATO granted: **April 25, 2013**