DEFENSE FINANCE AND ACCOUNTING SERVICE (DFAS)

Business Activity Monitoring Solution (BAM)

Unique Project (Investment) Identifier -
007-97-01-01-02-1785-00-402-129

PRIVACY IMPACT ASSESSMENT (PIA)

Point of Contact
[redacted]
Program Manager,
Enterprise Management Services
DFAS-HCRSE/IN
[redacted]

Reviewing Official
[redacted]
Chief Information Officer (CIO)
DFAS-HT/HQ
[redacted]

August 2007

PRIVACY IMPACT ASSESSMENT

1. Department of Defense Component: Defense Finance and Accounting Service

2. System Title: Business Activity Monitoring Solution (BAM)

3. Budget System Identification Number: N/A

4. System Identification Number(s) (IT Registry/Defense IT Portfolio Repository (DITPR)): DITPR ID No. 7905

5. IT Investment (OMB Circular A-11) Unique Identifier (if applicable): N007-97-01-01-02-1785-00-402-129/A

6. Privacy Act System of Records Notice Identifier (if applicable): NA

7. OMB Information Collection Requirement Number (if applicable) and Expiration Date: N/A

8. Type of authority to collect information (statutory or otherwise):

   The BAM system does not collect new information or information directly from individuals. All information collected by the BAM system is extracted from other existing systems. Many of these systems, such as OnePay, have their own Privacy Impact Assessments, and have been authorized by the following to collect the information covered by the Privacy Act: 5 U.S.C. 301, Departmental Regulations, and E.O. 9397.

9. Provide a brief summary or overview of the IT system (activity/purpose, present life cycle phase, system owner, system boundaries, and interconnections, location of system and components, and system backup).

   a. Activity/Purpose.

      A commercial-off-the-shelf COTS solution (including hardware and software) is being customized to implement the BAM technologies. The solution's purpose is to identify, monitor, reduce or eliminate transactional errors, misuse, and potential fraud resulting in financial discrepancies, losses, and workflow inefficiencies. The BAM solution will capture real-time or near real-time end-to-end transaction processing. When integrated with ERMP, it will automate and standardize governance and business processes through integration with financial and accounting systems. The solution will provide tracking and analysis of key control objectives at executive, management, and technician levels.

      BAM will be an automated system that enables DFAS to specify, execute, monitor, and coordinate the flow of work cases within an enterprise-wide environment. It will include an execution interface seen by end-users and a workflow engine that will perform the coordination of processes and activities.

   b. Present Life Cycle Phase.

      Operations and Support

   c. System Owner:

      [redacted] Program Manager, Defense Finance and Accounting Service,

Enterprise Management Services, DFAS HCRSE/IN, 8899 E. 56th Street, Indianapolis, IN 46249-0201, telephone [redacted]

d. System Boundaries and interconnections:

The BAM solution will extract data from the following existing systems in order to perform the business activity monitoring function:

Mechanization of Contract Administration Services (MOCAS)
Computerized Accounts Payable System-Windows (CAPS-W)
Integrated Accounts Payable System (IAPS)
OnePay
Automated Voucher Examination and Disbursement System/FAS (AVEDS/FAS)
Business System Modernization (BSM)
Computerized Accounts Payable System-Clipper (CAPS-Clipper)
Standard Automated Voucher Examination System (SAVES)
Windows Integrated Automated Travel System (WIN-IATS)
Defense Travel System (DTS)
Defense Joint Military Pay System (DJMS AC/RC)
Marine Corps Total Force System (MCTFS)
Defense Civilian Pay System (DCPS)
Defense Retiree and Annuitant System (DRAS)
Defense Cash Accountability System (DCAS)

System Location and Components.

DFAS-Indianapolis, 8899 E. 56th Street, Indianapolis, IN 46249-0201, telephone [redacted]

System Backup.

DFAS-Columbus, 3990 E. Broad Street, Columbus, OH 43213-1152.

10. Describe what information in identifiable form will be collected and the nature and source of the information (e.g., names, Social Security Numbers, gender, race, other component IT systems, IT systems from agencies outside DoD, etc.)

a. Information in Identifiable Form.

The BAM system does not collect data directly from individuals. All data retrieved by the BAM system is originally collected by the multiple "feeder systems", which are fed into the BAM. Information includes: Name, Social Security Numbers, Mailing Address, Salary Information, Bank routing Number, Tax ID, Age, Date of Birth, Military Status, Marital Status, email Addresses,.Vendor Cage,Vendor Bank Account Numbers and Employee Bank Account Number Codes, Telephone Number, BAM system login and password, and Pay system(s) affiliation. Specific data requirements will be determined as each system is integrated with BAM.

b. DFAS IT systems:

Mechanization of Contract Administration Services (MOCAS)
Computerized Accounts Payable System-Windows (CAPS-W)
Integrated Accounts Payable System (IAPS)
OnePay

Automated Voucher Examination and Disbursement System/FAS (AVEDS/FAS)
Business System Modernization (BSM)
Computerized Accounts Payable System-Clipper (CAPS-Clipper)
Standard Automated Voucher Examination System (SAVES)
Windows Integrated Automated Travel System (WIN-IATS)
Defense Travel System (DTS)
Defense Joint Military Pay System (DJMS AC/RC)
Defense Civilian Pay System (DCPS)
Defense Retiree and Annuitant System (DRAS)

DoD Component IT systems. Marine Corps Total Force System (MCTFS)

c. IT systems from agencies outside DoD

N/A

11. Describe how the information will be collected (e.g. via the Web, via paper-based collection, etc.).

The BAM solution will extract data via file transfer.

12. Describe the requirement and why the information in identifiable form is to be collected (e.g. to discharge a statutory mandate, to execute a Component program, etc.)

Identifiable information is collected as part of existing financial transaction records for business activity monitoring purposes. No new information will be collected for the BAM tool. Existing data will be analyzed by the BAM tool to identify, monitor, reduce or eliminate transactional errors, misuse, and potential fraud resulting in financial discrepancies, losses, and workflow inefficiencies. This analysis is in accordance with the requirements set forth in the Improper Payments Information Act of 2002 (Public Law No: 107-300).

13. Describe how the information in identifiable form will be used (e.g., to verify existing data, etc.)

The records containing information in identifiable form will be used to monitor and analyze financial transactions across multiple systems to identify, monitor, reduce or eliminate transactional errors, misuse, and potential fraud resulting in financial discrepancies, losses, and workflow inefficiencies.

14. Describe whether the system derives or creates new data about individuals through aggregation.

The BAM system will evaluate financial transactions to determine whether or not proper payments were made. It will not create new data about individuals. The BAM system uses business rules and integrity checks to create reports and statistics.

15. Describe with whom the information in identifiable form will be shared, both within the Component and outside the Component (e.g., other DoD Components, Federal agencies, etc.).

The information in the BAM system will be accessed by systems managers, developers, testers, customer help desk employees, regular BAM system users/clerks, and DFAS business unit managers. It will be shared with other government agencies, but only as it applies to the transaction or inquiry related to that agency, or as otherwise required by law. Information may be shared with law enforcement for investigative purposes.

16. Describe any opportunities individuals will have to object to the collection of information in identifiable form about themselves or to consent to the specific uses of the information in identifiable form. Where consent is to be obtained, describe the process regarding how the individual is to grant consent.

The BAM system will not collect information directly from individuals. privacy Act Statements and notices for each specific BAM "feeder system" are provided to individuals before using that system, and use is typically voluntary.

17. Describe any information that is provided to an individual, and the format of such information (Privacy Act Statement, Privacy Advisory) as well as the means of delivery (e.g., written, electronic, etc.), regarding the determination to collect the information in identifiable form.

Before accessing any "feeder system" from which the BAM system will collect its information, individuals are provided with the Privacy Act Statement appropriate for that system. These statements are typically provided on the form used to collect the data or on the Web-based application used to collect the information.

18. Describe the administrative/business, physical, and technical processes and controls adopted to secure, protect, and preserve the confidentiality of the information in identifiable form.

BAM records will be stored electronically on systems residing at DFAS-Indianapolis. The facility is physically protected by guards, electronic access, and/or locks. Access to records will be limited to individuals who are properly screened and cleared on a need-to-know basis in the performance of their official duties. Passwords and digital signatures will be used to control access to the systems data, and procedures will be in place to deter and detect browsing and unauthorized access. Physical and electronic access will be limited to persons responsible for servicing and authorized to use the record system.

19. Identify whether the IT system or collection of information will require a System of Records (SOR) notice as defined by the Privacy At of 1974, and as implemented by DoD Directive 5400.11-R, "DoD Privacy Program," August 1983. If so, and a SOR notice has been published in the Federal Register, the Privacy Act System of Records Identifier must be listed in question 6 above. If not yet published, state when publication of the Notice will occur. N/A

20. a. Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form. None

b. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals. N/A

c. Describe/evaluate further any risks posed by the adopted security measures.
NA.

21. State classification of information/system and whether the PIA should be published or not. If not, provide rationale. If a PIA is planned for publication, state whether it will be published in full or summary form.

This system/information within is sensitive but unclassified. The PIA will be published in full.

Signature Page - ERMP-BAM PIA

Preparing Official [redacted] 9-7-07
date
Name: [redacted]
Title: Program Manager
Organization: Systems Management Directorate, DFAS HCRSP/IN
Work Phone Number: [redacted]
E-mail: [redacted]

Information Assurance Official [redacted] 9/11/07
date
Name: [redacted]
Title: Director
Organization: Defense Finance and Accounting Service, Information and Technology Policy and Oversight Directorate (DFAS-HT/HQ)
Work Phone Number: [redacted]
E-mail: [redacted]

Privacy Officer [redacted] 9/7/07
date
Name: [redacted]
Title: Freedom of Information/Privacy Act Program Manager
Organization: Defense Finance and Accounting Service, Corporate Communications and Legislative Liaison (DFAS-HAC/DE)
Work Phone Number: [redacted]
E-mail: [redacted]

Reviewing Official [redacted] 9/20/07
date
Name: [redacted]
Title: Chief Information Officer
Organization: Defense Finance and Accounting Service, Information and Technology Directorate (DFAS-HT/HQ)
Work Phone Number: [redacted]
E-mail: [redacted]