

Privacy Impact Assessment Business Intelligence

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the Business Intelligence

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Abstract

Business Intelligence (BI) is a combination of applications hosted on the NITC platform at USDA, which includes ElectroFiche (eFiche), FOCUS, Geospatial Data Warehouse (GDW), Hyperion/EPM11, Oracle Business Intelligence Foundation Suite (OBIFS), Tableau Reporting System (TRS) and Tabular Data Warehouse (TDW). This PIA is being completed because eFiche, FOCUS, Hyperion/EPM 11, TDW, and TRS use PII data and the PTA has determined that a PIA is required for these BI applications.

Overview

The BI applications eFiche, FOCUS, Hyperion/EPM 11, TDW and TRS use PII data and they are documented in this PIA. eFiche, FOCUS, Hyperion/EPM 11, TDW and TRS are all hosted on the NITC platform and are BI applications.

BI is not used by the public or non-federal entities.

eFiche stores, reads, and retains files for RD. eFiche is hosted on the NITC platform. These files are reports generated by RD enterprise accounting and reporting systems. eFiche is available to Field Offices and large offices at USDA, including the Farm Services Agency (FSA), Customer Servicing Center (CSC), National Financial and Accounting Operations Center (NFAOC), and the Deputy Chief Information Officer (DCIO). With eFiche, RD staff maintain and research source documents including: promissory notes, payment assistance agreements, etc., It facilitates continual updates to reports and changes to information that was generated incorrectly. Reports can be downloaded and converted to MS Office or MS applications for queries to read, manipulate, sort, and compare the current day's business to the previous day's business. It has data analytics capabilities, and can compare data between reports. eFiche has the functionality for RD staff to cut, copy, and paste, and search stored information, perform selective printing, and provide backup documentation.

FOCUS produces reports from data residing on the National Information Technology Center (NITC) mainframe. FOCUS is used for entering, maintaining, retrieving, and analyzing data. RD staff mainly utilize the end-user reporting features of the FOCUS software.

Hyperion/EPM11 is a Commercial-Off-the-Shelf (COTS) application hosted on the NITC platform that provides canned reports as well as query and analysis capabilities using server-side Open Database Connectivity (ODBC) technology for centralized connectivity to a variety of data sources. Deployment of the COTS application server provides RD users with access to various databases using centralized database connections that have been established on the application server.

Oracle Business Intelligence Foundation Suite (OBIFS) is a commercial off the shelf (COTS) application hosted on the NITC platform that provides canned reports as well as query and analysis functions using server-side Open Database Connectivity (ODBC) technology for centralized connectivity to a variety of data sources. OBIFS provides RD users with access to

various databases using centralized database connections on the application server. Remote RD users access the application server via an Apache web server hosted on a Solaris server.

RD users access the OBIFS application using an e-Auth UserID and password. Once RD users have entered their E-Authentication credentials for OBIFS, they can view reports, dashboards and subject areas.

TRS (Tableau Reporting System) is a Commercial-Off-the-Shelf (COTS) application hosted on NITC platform that provides reports as well as query and analysis capabilities using server-side Open Database Connectivity (ODBC) technology for centralized connectivity to a variety of data sources. TRS provides RD users with access to various databases using centralized database connections that have been established on the application server. Remote RD users access the application server via an Apache web server hosted on a Linux server.

The RD user accesses the Tableau application using E-Authentication and PIV pin. Once the RD user has entered their E-Authentication credentials, they can retrieve documents and view reports from Tableau.

Tabular Data Warehouse (TDW) provides critical business data to RD decision-makers to sustain their respective program missions. TDW information is used to ensure loans and grants are provided in the rural areas where the need is greatest to stimulate economic growth and job creation.

TDW contains enterprise data that is refreshed nightly from on-line transactional processing (OLTP) systems. The data is cleansed, integrated, summarized and organized for analytical and informational processing. RD personnel use TDW to analyze massive quantities of data drawn from multiple sources, including non-integrated legacy systems as well as newly developed systems. TDW provides information on major program areas to assist RD management in making business decisions for RD customers. TDW Oracle and TDW Informix will be utilizing additional Extract-Transform-Load (ETL) capabilities from Informatica.

- Informatica's Extract-Transform-Load (ETL) PowerCenter will enable RD to access and integrate data from virtually any business system, in any format, and deliver that data throughout the enterprise, at any speed, to improve operational efficiency. PowerCenter serves as the foundation for all data integration projects and enterprise integration initiatives.
- Informatica ETL PowerExchange is a family of data access products that will enable RD to access all sources of enterprise data without having to develop custom data access programs.
- Informatica PowerExchange will enable RD to access, load, and deliver data as part of the ETL process to simplify the development and deployment of smaller departmental data marts and data warehouses as an incremental approach toward enterprise data warehousing.
- Informatica ETL Data Quality proactively monitors and cleanses the data for all applications and keeps the data sanitized. It enables RD to manage the data quality with data governance.

Informatica ETL B2B Data Transformation provides a comprehensive, enterprise-class solution for RD. It provides a good technical solution for extracting data from any file, document, or message, regardless of format, complexity, or size and transforming it into a usable form.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

eFiche:

- The general public
- Name
- Address Information
- Personal identification number
- Financial data
- Miscellaneous identification numbers
- Handwriting or an image of the signature
- SSN/TIN

FOCUS:

- USDA employees
- Contractors or other entities working on behalf of USDA
- Name
- Address Information
- SSN/TIN

Hyperion/EPM11:

- USDA employees
- Contractors or other entities working on behalf of USDA
- The general public
- Name
- Address Information
- Personal identification number
- Miscellaneous identification numbers
- Handwriting or an image of the signature
- SSN/TIN

TDW:

- The general public
- Name
- Address Information
- Personal identification number
- Financial data
- Miscellaneous identification numbers
- Handwriting or an image of the signature
- SSN/TIN

TRS:

- Employee Information:
- USDA employees
- Contractors or other entities working on behalf of USDA
- The general public
- Name
- Address Information
- Personal identification number
- Financial data
- Miscellaneous identification numbers
- Handwriting or an image of the signature
- SSN/TIN

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

eFiche receives data from NITC mainframe datasets created by the source systems. RD loan and grant information comes from the following source systems: LoanServ, Automated Multi-Family Housing Accounting System (AMAS), Program Loan Accounting System (PLAS), Farmer Programs (FP), Community Facilities (CF), Commercial Loan Servicing System (CLSS), Rural Business and Industry (B&I), Water and Environmental Programs (WEP) and Guaranteed Loan System (GLS). Information is then securely extracted from system source data and provided for use by agency staff.

FOCUS gets its information from the NITC mainframe.

ECM sends information to Hyperion/EPM 11 for reports. Hyperion/EPM 11 receives data from TDW.

TDW receives data for reports from the following internal USDA applications: AMAS, CLSS, GLS, LoanServ, MFIS, PFCS, New Loan Originations, CPAP, ReConnect, and eServices.

Tableau Reporting System (TRS) gets information from internal BI loan servicing data sources and BI financial management data sources using server-side Open Database Connectivity (ODBC) technology.

1.3 Why is the information being collected, used, disseminated, or maintained?

eFiche collects information for business intelligence purposes to support RD mission/business needs. RD employees use eFiche for business analysis, data trending, and data analytics for RD mission/business needs.

FOCUS uses RD loan servicing data and financial management data for business intelligence purposes to support RD’s mission/business needs.

Hyperion/EPM11 uses pre-defined queries that are submitted to RD loan servicing data sources and financial management data sources. Hyperion/EPM 11 data is used to support RD mission/business needs.

TDW collects information for business intelligence purposes to support RD mission/business needs. RD employees use TDW information for business analysis, data trending, and data analytics.

TRS uses pre-defined queries that are submitted to USDA loan servicing data sources and USDA financial management data sources. TRS information supports RD mission/business needs.

1.4 How is the information collected?

eFiche and FOCUS collect RD loan and grant application from the following: LoanServ, Automated Multi-Family Housing Accounting System (AMAS), Program Loan Accounting System (PLAS), Farmer Programs (FP), Community Facilities (CF), Commercial Loan Servicing System (CLSS), Rural Business and Industry (B&I), Water and Environmental Programs (WEP) and Guaranteed Loan System (GLS). Information is then securely extracted from system source data and provided for use by RD agency staff.

Hyperion/EPM11 does not collect data. Hyperion/EPM 11 provides canned reports as well as query and analysis capabilities using server-side Open Database Connectivity (ODBC) technology for internal RD business analysis use.

RD source systems securely transfer system data to TDW for internal RD business analysis use.

TRS provides reports as well as query and analysis capabilities using server-side Open Database Connectivity (ODBC) technology.

1.5 How will the information be checked for accuracy?

RD staff that support eFiche, FOCUS and TRS provide regular review as part of the standard business processes to check information in these applications for accuracy and provide any necessary corrections, if applicable.

Hyperion/EPM11 data is checked internally by RD staff with validation queries to compare data loaded into the data warehouse tables to data content within the flat files.

TDW data is checked internally by RD staff with validation queries to compare data loaded into the TDW tables to data content within the flat files.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

Information contained in BI falls under the following:

- *Privacy Act of 1974, as Amended (5 USC 552a);*
- *Computer Security Act of 1987, Public Law 100-235, ss 3 (1) and (2), codified at 15 U.S.C. 272, 278 g-3, 278 g-4 and 278 h which establishes minimum security practices for Federal computer systems;*
- *OMB Circular A-130, Management of Federal Information Resources, Appendix III, Security of Federal Automated Information Resources, which establishes a minimum set of controls to be included in Federal automated information security programs; assigns Federal agency responsibilities for the security of automated information; and links agency automated information security programs and agency management control systems;*
- *Freedom of Information Act, as Amended (5 USC 552), which provides for the disclosure of information maintained by Federal agencies to the public while allowing limited protections for privacy.*
- *Federal Information Security Modernization Act of 2014*
- *Consolidated Farm and Rural Development Act (7 U.S.C. 1921 et seq) and Title V of the Housing Act of 1949 as amended (42 U.S.C. 1471 et seq).*
- *Farm Bill 2018 (P.L. 115-334)*
- *Fair Credit Reporting Act, 15 USC 1681 a(f)*
- *Consumer Credit Protection Act, 15 USC 1601*
- *Equal Credit Opportunity Act, 15 USC 1691*
- *7 CFR, part 1770, subpart A and part 1773*
- *RD Records Management Policy*
- *NARA Records Retention*

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

The risk is in the potential unauthorized disclosure or illegal use of PII in the BI applications and the potential adverse consequences this disclosure or use would have on the RD customer.

BI system owners for eFiche, FOCUS, Hyperion/EPM11, TRS and TDW define access roles to ensure separation of duties, account management and authorized access to data and information in their BI applications. These measures help mitigate the risks to privacy data in eFiche, FOCUS, Hyperion/EPM11, TRS and TDW. Also, all the BI applications have

network security protections, including audit logs of the applications from NITC and USDA network security protections.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

eFiche produces RD loan servicing and financial management paper copy reports sent to Farm Services Agency (FSA), Customer Servicing Center (CSC), National Financial and Accounting Operations Center (NFAOC), and the Deputy Chief Information Officer (DCIO).

FOCUS produces reports from RD loan servicing and financial management data located on the NITC mainframe. FOCUS provides information with comprehensive features for entering, maintaining, retrieving, and analyzing data from loans and financial management data.

Hyperion/EPM11 provides canned reports as well as query and analysis capabilities to RD users. The applications access various databases using centralized database connections that have been configured on the application server. RD analysts can also build queries, reports, pivots, charts, and Executive Information System (EIS) dashboards to facilitate navigation and produce documents and reports.

TDW is a repository providing critical business data, in an expedient manner for the RD management to sustain their respective program missions. TDW provides loan and grant information from the RD program areas to support RD business decisions for RD customers.

TRS provides RD users with access to various reports and dashboards. TRS supports query and analysis capabilities using pre-defined data sources that allow RD users to analyze data with drag and drop functions. TRS provides visualized data and smart dashboards where the RD user can combine multiple views of data. TRS utilizes live connections along with automatic updates on a regular schedule, so information is current and regularly updated.

2.2 What types of tools are used to analyze data and what type of data may be produced?

eFiche does not use tools, so this is not applicable to this application.

FOCUS and Hyperion/EPM11 use a software product, Information Builders, to analyze data and provide reports from the analysis. The reports have data analytics/business intelligence information.

TDW uses Hyperion/EPM 11 to run queries and produce reports against TDW data. The reports have data analytics/business intelligence information to assist RD management.

TRS reads information from data sources to produce read-only reports. TRS utilizes its own analytical reporting functionalities, including dashboard presentation tools.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

Not applicable, the applications included in BI do not use commercial or publicly available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

The controls in place to detect unauthorized access to information or applications in BI include NITC audit logs. E-authentication is used with the BI applications and there are audit logs of user activity as well.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 How long is information retained?

Data retention requirements for the BI applications are in accordance with NARA, RD Records Management policy and financial compliance regulations.

3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

Yes, BI applications follow data retention as provided by the RD Records Management, which is in accordance with NARA.

3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

BI applications data retention has the potential risk of unauthorized access, unauthorized disclosure or illegal use of the customer PII data.

The RD data in BI applications is protected by the NITC hosting environment, which follows USDA federal agency requirements for data protection and is accredited by FedRAMP. BI

applications follow the RD Records Management data retention requirements to manage risk associated with data retention.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

eFiche, FOCUS, Hyperion/EPM11, TDW, and TRS share financial management information with FSA to support loan and grant origination and processing and for business analysis, data trending, and data analytics in support of the RD mission.

Enterprise Content Management (ECM) sends information to Hyperion/EPM 11 for reports. Hyperion/EPM 11 receives data from TDW. Predefined queries submitted to RD loan servicing data sources and financial management data sources are utilized by Hyperion/EPM 11 for data analysis. This information is utilized in reports and dashboards for RD mission/business needs.

TDW receives data for reports and query and analysis using server-side Open Database Connectivity (ODBC) technology from AMAS, CLSS, GLS, LoanServ, MFIS, PFCS, New Loan Originations, CPAP, ReConnect, and APR, and ACR (eServices). This information is collected for business intelligence purposes and made available to RD employees for business analysis, data trending, and data analytics.

4.2 How is the information transmitted or disclosed?

eFiche, FOCUS, Hyperion/EPM11, TDW and TRS transmit information electronically via PDF, XLS and using encrypted data files.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

The risk to internal information sharing would be the unauthorized disclosure of loan and grant information, including PII and financial data.

NITC provides protection to the BI applications data, including PII and sensitive financial data, in transit and at rest, since they are hosted on the NITC hosting platform. BI applications use of PII data internally is consistent with routine uses of sharing of PII data under SORN 1.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

BI applications do not share information externally.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

BI applications do not share PII outside of USDA, so this is not applicable.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

Not applicable, BI applications do not share information externally. BI applications are used internally.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Not applicable, BI applications do not share information externally. BI applications are used internally.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Does this system require a SORN and if so, please provide SORN name and URL.

Yes, it follows SORN 1, but BI applications are not accessible to the general public.

6.2 Was notice provided to the individual prior to collection of information?

Not applicable, BI applications are used internally by RD staff, so it is not accessible to the general public.

6.3 Do individuals have the opportunity and/or right to decline to provide information?

Not applicable, BI applications are used internally by RD staff, so it is not accessible to the general public.

6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

Not applicable, BI applications are used internally by RD staff, so it is not accessible to the general public.

6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Not applicable, BI applications are used internally by RD staff, so it is not accessible to the general public.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 What are the procedures that allow individuals to gain access to their information?

Not applicable, BI applications are used internally by RD staff, so it is not accessible to the general public.

7.2 What are the procedures for correcting inaccurate or erroneous information?

Not applicable, BI applications are used internally by RD staff, so it is not accessible to the general public.

7.3 How are individuals notified of the procedures for correcting their information?

Not applicable, BI applications are used internally for data analysis, data trending and business analysis.

7.4 If no formal redress is provided, what alternatives are available to the individual?

Not applicable, BI applications are used internally for data analysis, data trending, and business analysis, so there is no need for redress as it is not accessible by the general public.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Not applicable, redress is not needed for BI applications, since these are used internally by RD staff.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

Desk Procedures document the User Access Management (UAM) Team process for establishing, activating, and modifying individual users for BI applications. The group and account types are defined by System Owners for each BI application. The System Point of Contact (POC) assigns group membership and determines individual RD user access. The UAM Team creates, modifies and deletes user requests approved by the System Point of Contact.

RD employees and RD contractors access individual BI applications after being provisioned in E-Authentication by a User Access Management (UAM) ticket, created by the System POC and completed by the UAM Team (UAMT).

Steps to provision RD employees and RD contractors follow desk procedures as set by the system owner for each BI application.

8.2 Will Department contractors have access to the system?

Yes, only authorized RD contractors with a need to know will have access to a BI application as part of their regular assigned duties and follow the same access and authentication procedures that RD federal employees follow to access BI applications.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

Yes, All RD employees and contractors are required to complete annual information security and awareness training, which includes privacy training for BI applications.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Yes, BI applications have an ATO, which is in CSAM.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

BI complies with the Federal Information Security Modernization Act of 2014 (FISMA) by documenting the Authorization and Accreditation, annual control self-assessments, and continuous monitoring in accordance with National Institute of Standards and Technology (NIST) Special Publication 800-53, Rev. 4. BI applications, eFiche, FOCUS, Hyperion/EPM 11, TRS and TDW, are hosted on the NITC platform at USDA, which is FedRAMP certified and use USDA network security protections.

Access to eFiche, FOCUS, Hyperion/EPM 11, TRS and TDW is controlled through Level 2 E-Authentication with audit logs of user activity for BI applications. The User Access Management Team has standard desktop procedures and a roles matrix defining the level of access and how to provision this access to RD users of BI applications. They audit the list of users and applications that they have access to. User Access Management verification reports can be used to verify these groups are assigned appropriately and account management controls are in place.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Since BI applications are used by internal RD users and there are group access management controls, the privacy risks are minimal. Potential compromise of privacy data is mitigated by NITC audit monitoring and USDA network security protections in place to protect RD data for BI applications (eFiche, FOCUS, Hyperion/EPM 11, TRS and TDW). Additionally, the BI applications are accessed using E-Authentication through the USDA network.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

eFiche produces RD loan servicing and financial management paper copy reports sent to Farm Services Agency (FSA), Customer Servicing Center (CSC), National Financial and Accounting Operations Center (NFAOC), and the Deputy Chief Information Officer (DCIO).

FOCUS produces reports from RD loan servicing and financial management data located on the NITC mainframe. FOCUS provides information with comprehensive features for entering, maintaining, retrieving, and analyzing data from loans and financial management data.

Hyperion/EPM11 provides canned reports as well as query and analysis capabilities to RD users. The applications access various databases using centralized database connections that have been configured on the application server. RD analysts can build queries, reports, pivots, charts, and Executive Information System (EIS) dashboards to provide documents and reports to RD management.

TDW is a repository providing critical business data, in an expedient manner for the RD decision-makers to sustain their respective program missions. It provides loan and grant information from the primary RD program areas needed to make informed management decisions supporting the needs of RD customers.

TRS provides RD users with access to various reports and dashboards. TRS supports query and analysis capabilities using pre-defined data sources that allow RD users to analyze data with drag and drop functions. TRS provides visualized data and smart dashboards where the RD user can combine multiple views of data. TRS utilizes live connections along with automatic updates on a regular schedule, so information is current and regularly updated.

For all technologies chosen by RD, an Analysis of Alternatives (AoA) is completed to determine which technologies will be selected and ultimately purchased or built.

9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

No, the BI applications utilize Agency approved technologies and these technology choices do not raise privacy concerns.

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?

Yes, the system owner and the ISSPM have reviewed the OMB memorandums.

10.2 What is the specific purpose of the agency’s use of 3rd party websites and/or applications?

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.3 What personally identifiable information (PII) will become available through the agency’s use of 3rd party websites and/or applications.

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.4 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be used?

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.5 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be maintained and secured?

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.6 Is the PII that becomes available through the agency’s use of 3rd party websites and/or applications purged periodically?

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.7 Who will have access to PII that becomes available through the agency’s use of 3rd party websites and/or applications?

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.8 With whom will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be shared - either internally or externally?

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.9 Will the activities involving the PII that becomes available through the agency’s use of 3rd party websites and/or applications require either the creation or modification of a system of records notice (SORN)?

Not applicable, BI applications do not use 3rd party websites and/or applications.

10.10 Does the system use web measurement and customization technology?

Not applicable, BI applications do not use web measurement and customization technology.

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

Not applicable, BI applications do not use web measurement and customization technology.

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency’s use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

Not applicable, BI applications do not use 3rd party websites and/or applications.



Responsible Officials

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