
ServiceNow Enterprise Service Management

# PRIVACY AND CIVIL LIBERTIES IMPACT ASSESSMENT (PCLIA)

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**Reviewing Official**

Ron Shelden

## OFFICE OF THE COMPTROLLER OF THE CURRENCY

## Risk Level

Please check **ALL** that apply to the information system or information technology (IT) for which you are conducting this PCLIA:

■ This PCLIA is for a "major information system"

☐ This PCLIA is for an information system or IT rated "Moderate" or "High" impact for confidentiality under Federal Information Processing Standard 199, at least in part because of its PII content.

☐ This PCLIA is for an information system or IT designated as a Treasury High Value Asset (HVA).

### Estimated number of individuals whose PII is maintained in the system

| | | |
|---|---|---|
| ☐ 0 – 999 | ☐ 1,000 – 9,999 | ☐ ■10,000 – 99,999 |
| ☐ 100,000 – 499,999 | ☐ 500,000 – 999,999 | ☐ 1,000,000+ |

## Section 1: Introduction

This PCLIA provides the following information regarding the system:

(1) an overview of its purpose and functions;

(2) a description of the information collected;

(3) a description of the how information is maintained, used, and shared;

(4) an assessment of whether the system is in compliance with federal requirements that support information privacy; and

(5) an overview of the redress/complaint procedures available to individuals who may be affected by the use or sharing of information by the system.

## Section 2: System Overview

### Section 2.1: System Description and Purpose

**System Description:**

ServiceNow (SN) is a digital workflow management platform, which provides Software as a Service (SaaS) suite of natively integrated applications designed for enterprise service management automation, resource management and shared support services.

**System Purpose:**

ServiceNow is the Enterprise Service Management solution that facilitates workflows for the OCC. These workflows facilitates business processes between provider and customer both of which are internal OCC personnel.

### 2.1. Is this a new information system or a significant revision of an existing system?

☐ New system.

☐ Revision of Existing system.

☑ No significant change in existing system

### Section 2.2: Authority to Collect

12 U.S.C. 481

### Section 2.3: Privacy Act Applicability; SORN Requirement

### Section 2.3(a) Please check ALL statements below that apply to your system and provide any additional information requested.

1. ☐ The system does not retrieve records about an individual using an identifying number, symbol, or other identifying particular assigned to the individual. A SORN is not required with respect to the records in this system.

2. ▣ The system does retrieve records about an individual using an identifying number,

   symbol, or other identifying particular assigned to the individual. A SORN is required with respect to the records in this system.

3. ☐ A SORN was identified in the original PCLIA and a determination was made during this current PCLIA update that modifications [choose one] ☐ were ☐ were not required to that SORN. [If modifications were made, generally describe them here].

   The current applicable SORN is:

4. ▣ A SORN(s) was not identified or required in the original PCLIA, but a determination was made during this current PCLIA update that a SORN(s) is now required. The applicable SORN(s) is:
   Currently in process

5. ▣ A SORN was published and no exemptions are taken from any Privacy Act

requirements.

6. ☐ Exemptions are claimed from the following Privacy Act provisions in the applicable SORN(s):

## Section 3: Information Collection

### Section 3.1: Relevant and Necessary

#### Section 3.1(a) Exemption Claimed from this Requirement?

☐ The PII maintained in this system or by this project is ***not*** exempt from 5 U.S.C. § 552a(e)(1), the Privacy Act's requirement that an agency "*maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose of the agency required to be accomplished by statute or by executive order of the President*."

☐ The PII maintained in this system or by this project **is** exempt from 5 U.S.C. § 552a(e)(1), because [See Appendix B for a list of acceptable bases for claiming this exemption and cut and paste **here** all that apply].

#### Section 3.1(b) Continuously Assessing Relevance and Necessity

1. ☐ The PII in the system is not maintained in a system of records. Therefore, the Privacy requirements do not apply. *[Explain **here** what you do to ensure relevance and necessity despite the fact that the Privacy Act does not apply].*

2. ☐ The PII in the system is maintained in a system of records, but the agency exempted these records from the relevance and necessity requirement. *[Explain **here** what you do to ensure relevance and necessity to the extent possible despite the fact the records are exempt from this requirement].*

3. ▣ The system owner conducted an assessment prior to collecting PII for use in the system.

4. ▣ With respect to PII ***currently*** maintained (as of the time this PCLIA is being done) in the system, the PII *[choose one]* ▣ is ☐ is not limited to only that which is relevant and necessary to meet the system's or project's mission requirements. During the PCLIA process, the system always undergoes a review to ensure the continuing relevance and necessity of the PII in the system.

5. ☐ With respect to PII maintained in the system, there [choose one] ☐ is ☐ is not a process in place to continuously reevaluate and ensure that the PII remains relevant and

necessary. During the PCLIA process, the system always undergoes a review to ensure the continuing relevance and necessity of the PII on the system. If a determination is made that particular PII is no longer relevant and necessary in between PCLIA updates, this PCLIA will be updated at that time.

## Section 3.2: PII and/or information types or groupings

### Biographical/general information

- ■ Name
- ☐ Age
- ■ Date of birth
- ■ Home physical/postal mailing address
- ■ Zip Code
- ■ Personal home phone, cell phone, or fax number
- ☐ Other:
- ☐ Nationality
- ☐ Citizenship
- ☐ Ethnicity
- ☐ Gender
- ☐ Race
- ■ Personal e-mail address
- ☐ Country of Birth
- ☐ Immigration Status
- ■ Alias (including nickname)
- ☐ City or County of Birth
- ■ Military Service Information
- ■ Country or city of residence

### Other information

- ☐ Resume or curriculum vitae
- ☐ Religion/Religious Preference
- ☐ Professional/personal references or other information about an individual's friends, associates or acquaintances.
- ☐ Sexual Orientation
- ☐ Group/Organization Membership
- ☐ Other:
- ■ Cubical or office number
- ■ Retirement eligibility information
- ■ Contact lists and directories (known to contain at least some personal information).
- ■ Marital Status
- ■ Information about children
- ■ Veteran's preference
- ■ Spouse Information
- ☐ Information about other relatives
- ■ Education Information
  Continuing Education Requests

### Identifying numbers assigned to individuals

- ■ Full Social Security number
- ■ Truncated Social Security Number (e.g., last 4 digits)
- ■ Employee Identification Number
- ☐ Taxpayer Identification Number
- ☐ File/Case ID Number
- ☐ Alien Registration Number
- ☐ Other:
- ☐ Personal device identifiers or serial numbers
  ■
- ☐ Internet Protocol (IP) Address
- ☐ Personal Bank Account Number
- ☐ Health Plan Beneficiary Number
- ☐ Credit Card Number
- ☐ Patient ID Number
- ☐ Vehicle Identification Number
- ☐ Driver's License Number
- ■ License Plate Number
- ☐ Professional License Number
- ☐ Passport Number and information (nationality, date and place of issuance, and expiration date)

## Specific Information/File Types

☐ Taxpayer Information/Tax Return Information

☐ Civil/Criminal History Information/Police Records (obtained from government source)

☐ Protected Information (as defined in Treasury Directive 25-10)

☐ Information provided under a confidentiality agreement

☐ Business Financial Information (including loan information)

☐ Passport information (state which passport data elements are collected if not all)

☐ Other:

☐ Law Enforcement Information

☐ Civil/Criminal History Information/Police Records (obtained from commercial source)

☐ Credit History Information (commercial source)

☐ Personal Financial Information (e.g., loan information)

☐ Case files

☐ Security Clearance/Background Check Information

☐ Credit History Information (government source)

☐ Bank Secrecy Act Information

☐ Personnel Files

☐ Information subject to the terms of an international or other agreement

## Audit Log and Security Monitoring Information

■ User ID assigned to or generated by a user of Treasury IT

☐ Passwords generated by or assigned to a user of Treasury IT

☐ Files accessed by a user of Treasury IT (e.g., web navigation habits)

☐ Public Key Information (PKI).

▣ Internet Protocol (IP) Address

☐ Global Positioning System (GPS)/Location Data

■ Network communications data

▣ Other:

Vulnerability information through our integration with Qualys and Splunk

☐ Files and folders accessed by a user of Treasury IT

☐ Internet or other queries run by a user of Treasury IT

☐ Date and time an individual accesses a facility, system, or other IT

☐ Still photos of individuals derived from security cameras.

☐ Video of individuals derived from security cameras

☐ Secure Digital (SD) Card or Other Data stored on a card or other technology

☐ Cell tower records (e.g., logs. user location, time etc.)

☐ Biometric information used to access Treasury facilities or IT

☐ Contents of files accessed by a user of Treasury IT

☐ Information revealing an individual's presence in a particular location as derived from security token/key fob, employee identification card scanners or other IT.

☐ Purchasing habits or preferences

☐ Commercially obtained internet navigation/purchasing habits of individuals

☐ Device settings or preferences (e.g., security level, sharing options, ringtones).

## Medical/Emergency Information Regarding Individuals

☐ Medical/Health Information
☐ Worker's Compensation Act Information
☐ Emergency Contact Information (e.g., a third party to contact in case of emergency)
☐ Mental Health Information
☐ Information regarding disability
☐ Patient ID Number
☐ Sick leave information
☐ Request for an accommodation under the Americans with Disabilities Act
☒ Other:

Employees with a 508 compliance accomodation are identified via a special non-specific tag (VIP). This is a non-specific tag for use by IT Customer Support staff which does not identify/disclose 508 accommodation.

## Biometrics/Distinguishing Features/Characteristics of Individuals

☐ Physical description/ characteristics (e.g., hair, eye color, weight, height, sex, gender etc.) Identify which are collected:
☒ Photos/Video:
Profile Pic
☐ Palm prints
☐ Fingerprints
☒ Signatures
☐ Voice audio recording
☐ Other:

## Identifying numbers for sole proprietors (including business information)

☐ Sole proprietor business credit card number
☐ Business Phone or Fax Number
☐ Business Physical/Postal Mailing Address
☐ Sole proprietor business professional license number
☐ Sole proprietor business file case number
☐ Sole proprietor business taxpayer identification number
☐ Sole proprietor business license plate number
☐ Sole proprietor business vehicle identification number
☐ Sole proprietor business bank account number
☐ Other:

## Section 3.3 Sources from which PII is obtained

## Members of the Public

☐ Members of the Public (i.e., including individuals who are current federal employees who are providing the information in their "personal" capacity (unrelated to federal work/employment). All of the following are members of the public. Please check relevant boxes (based on the context of collection and use in this system) for members of the public whose information is maintained in the system (only check if relevant to the purpose for collecting and using the information):

☐ Members of the general public.
☐ Retired federal employees.

☐ Former Treasury employees

☐ Federal contractors, grantees, interns, detailees etc.

☐ Federal job applicants.
☐ Other:

### Current Federal Employees, Interns, and Detailees

☒ Current Federal employees providing information in their capacity as federal employees
☒ Interns.
Interns can use Gethelp through their OCC accounts

☒ Detailees.
Detailees can use Gethelp through their OCC accounts

☐ Other employment-related positions.

### Treasury Bureaus (including Departmental Offices)

☐ Other Treasury Bureaus:

### Other Federal Agencies

☐ Other federal agencies:

### State and Local Agencies

☐ State and local agencies:

### Private Sector

☐ Private sector organizations (for example, banks and financial organizations, data brokers or other commercial sources):

### Other Sources

☐ Other sources not covered above (for example, foreign governments).

## Section 3.4: Privacy and/or civil liberties risks related to collection

### Section 3.4(a) Collection Directly from the Individual to whom the PII pertains

1. ☐ None of the PII in the system was collected directly from an individual to whom it

2. ▣ Some or ☐ all of the information in this system was collected directly from an individual to whom it pertains.

### Section 3.4(b) Privacy Act Statements

1. ☐ None of the PII in the system was collected directly from the individuals to whom it pertains. Therefore, a Privacy Act Statement is not required.

2. ▣ Some ☐ All of the PII in the system was collected directly from the individual to whom it pertains. Therefore, a Privacy Act Statement was posted at the point where the PII was collected directly from the individual. That Privacy Act Statement was provided to the individual ☐ on the form in which the PII was collected ☐ on a separate sheet of paper that the individual could retain; or ☐ in an audio recording or verbally at the point where the information was collected (e.g., on the phone) or ☐ other:

   The Privacy Act Statement contained the following
   a. ☐ The authority (whether granted by statute, or by Executive order of the President) which authorizes the solicitation of the information.
   b. ☐ Whether disclosure of such information is mandatory or voluntary.
   c. ☐ The principal purpose or purposes for which the information is intended to be used.
   d. ☐ The individuals or organizations outside of OCC with whom the information may be/ will be shared.
   e. ☐ The effects on the individual, if any, if they decide not to provide all or any part of the requested information

### Section 3.4(c) Use of Full Social Security Numbers

#### *3.4(c)i. Justification of Social Security Numbers*

1. ☐ N/A No full SSNs are maintained in the system.

2. ☐ Full SSNs are maintained in the system and the following approved Treasury uses of

SSNs apply: [

☐ security background investigations;

☐ interfaces with external entities that require the SSN;

☐ a legal/statutory basis (e.g. where collection is expressly required by statute);

☐ when there is no reasonable, alternative means for meeting business requirements;

☐ statistical and other research purposes;

☐ delivery of government benefits, privileges, and services;

☐ for law enforcement and intelligence purposes;

☐ aging systems with technological limitations combined with funding limitations render impracticable system modifications or replacements to add privacy risk reduction tools (partial/truncated/redacted or masked SSNs); and

☐ as a unique identifier for identity verification purposes.

***3.4(c)ii. Controls implemented to limit access to and or improper disclosure of full Social Security Numbers***

1. ☐ Full SSNs are ***not*** maintained in the system.

2. ▣ Full SSNs ***are*** maintained in the system and the following controls are put in place to reduce the risk that the SSN will be seen or used by someone who does not have a need to use the SSN in order to perform their official duties (*check **ALL** that apply*):

   a. ▣ The entire SSN data field is capable of suppression (i.e., being turned off) and the data field is suppressed when the SSN is not required for particular system users to perform their official duties.
   b. ☐ do not require the SSN to perform their official duties.
   c. ☐ Within the system, an alternative number (e.g., an Employee ID) is displayed to all system users who do not require the SSN to perform their official duties. The SSN is only linked to the alternative number within the system and when reporting outside the system (to an agency that requires the full SSN). The SSN is not visible to system users (other than administrators).
   d. ☐ The SSN is truncated (i.e., shortened to the last 4 digits of the SSN) when displayed to all system users for whom the last four digits (but not the full) SSN are necessary to perform their official duties.
   e. ☐ Full or truncated SSNs are only downloaded to spreadsheets or other documents for sharing within the bureau or agency when disclosed to staff whose official duties require access to the full or truncated SSNs for the particular individuals to whom they pertain. No SSNs (full or truncated) are included in spreadsheets or documents unless required by each recipient to whom it is disclosed in order to perform their official duties (e.g., all recipients have a need to see the SSN for each employee in the spreadsheet).
   f. ▣ Other:

Access to SSN is limited to the required group within Human Capital. Access to the data and underlying tables is restricted to just said group within Human Capital and not available to standard users or ServiceNow Support Staff.

***3.4(c)iii Denial of rights, benefits, or privileges for refusing to disclose Social Security Number***

1. ☐ N/A No SSNs are maintained in the system.

2. ☐ Full SSNs are collected, but no individual will be denied any right, benefit, or privilege provided by law if the individual refuses to disclose their SSN for use in the system. If the individual chooses not to provide their SSN.
3. ☐ Full SSNs are collected, and the individual will be denied the following right, benefit, or privilege provided by law if they refuse to disclose their SSN:
   Denial of this right, benefit or privilege does not violate the law because: [choose one of the two boxes below]:
   a. ☐ SSN disclosure is required by the following Federal statute or Executive Order; **OR**
   b. ☐ The SSN is disclosed to a Federal, state, or local agency that maintains a system of records that was in existence and operating before January 1, 1975, and disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual.

## Section 3.4(d) Records describing how individuals exercise First Amendment rights

1. ☐ N/A. The system does ***not*** maintain information describing how an individual exercises their rights guaranteed by the First Amendment.

2. ☐ The system ***does*** maintain information describing how an individual exercises their rights guaranteed by the First Amendment.
   *a.* ☐ The individual about whom the information was collected or maintained expressly authorizes its collection/maintenance. The individual about whom the information was collected or maintained expressly authorized its collection by:

   *b.* ☐ The information maintained is pertinent to and within the scope of an authorized law enforcement activity because:

*c.* ☐ The following statute expressly authorizes its collection:

[*your response MUST contain all three if you use a statute as the basis for the collection*].

## Section 4: Maintenance, use, and sharing of the information

### Section 4.1: Ensuring accuracy, completeness, and timeliness of information collected, maintained, and shared when it is used to make determinations about individuals

### Section 4.1(a). Exemption from the accuracy, relevance, timeliness, and completeness requirements in section (e)(5) of the Privacy Act

1. ▣ ***None*** of the information maintained in the system that is part of a system of records

   is exempt from the accuracy, relevance, timeliness, and completeness requirements in section (e)(5) of the Privacy Act.

2. ☐ All ☐ Some of the PII maintained in the system is part of a system of records and ***is*** exempt. The exemption claimed for these records is appropriate because *[please see Appendix B which contains sample justifications for this exemption and provide the appropriate bases* ***here*** *[more than one bases may apply]*.
3. ☐ The PII maintained in the system is ***not***: (a) part of a system of records as defined in section (e)(5) of the Privacy Act; or (b) used to make adverse determinations about individuals (defined in the Privacy Act as U.S. Citizens and legal permanent residents). Instead, the information is used to:

4. ☐ ***None*** of the information maintained in the system is part of a system of records. Despite the fact that the Privacy Act does not apply, the following protections are in place to ensure fairness to the individual:

## Section 4.1(b) Protections in place despite exemption from the accuracy, relevance, timeliness, and completeness requirements

1. ▣ ***None*** of the information maintained in the system that is part of a system of records is exempt.

2. ☐ For all information maintained in the system that is part of a system of records that is exempt, the following efforts are made to ensure accuracy, relevance, timeliness, and completeness to the extent possible without interfering with the (*check one*) ☐ law enforcement ☐ intelligence ☐ other:
mission requirements for which the system was created:
   a. ☐ The exempt information is ***not*** actually used to make any adverse determinations about individuals.
   b. ☐ The exempt information is ***not*** actually used to make any adverse determinations about individuals without additional research and investigation to ensure accuracy, relevance, timeliness, and completeness.
   c. ☐ Individuals and organizations to whom PII from the system is disclosed (as authorized by the Privacy Act) determine its accuracy, relevance, timeliness, and completeness in a manner reasonable for their purposes before they use it to make adverse determinations about individuals.
   d. ☐ Individuals about whom adverse determinations are made using PII from this system are given an opportunity to explain or modify their information (check one) ☐ before ☐ after the adverse determination is made. During this process, individuals are allowed to:
   e. ☐ Other:

3. ☐ No additional efforts are made to ensure accuracy, relevance, timeliness, and completeness to the extent possible because it would interfere with mission requirements.

## Section 4.1(c)Collecting information directly from the individual when using it to make adverse determinations about them.

1. ▣ The records maintained by this system are **not** used to make any adverse determinations about individuals

2. ☐ The records maintained by this system **are** used to make adverse determinations about individuals ***and*** *:*

   a. ☐ These records ***were*** exempted from the Privacy Act provision that requires collection directly from the subject individual to the greatest extent practicable.

   ***b.*** ☐ These records were ***not*** exempted from the requirement to collect information directly from the individual to the greatest extent practicable ***and***

      *i.* ☐ ***All*** records used to make an adverse determination are collected directly from the individual about whom the decision is made.

      *ii.* ☐ A ***combination*** of records collected from third parties ***and*** directly from the individual about whom the determination is made are used to make the determination because:

      *iii.* ☐ ***None*** of the records used to make adverse determinations are collected directly from the individual about whom determinations are made because seeking the information directly from the individual might *:*

         ☐ alert the individual to the fact that their conduct is being observed or investigated;

         ☐ cause the individual to alter or modify their activities to avoid detection;

         ☐ create risks to witnesses or other third parties if the individual is alerted to the fact that their conduct is being observed or investigated;

         ☐ Other:

**Section 4.1(d) Additional controls designed to ensure accuracy, completeness, timeliness and fairness to individuals in making adverse determinations**

***Administrative Controls*** Individuals about whom information is collected are given the following opportunities to amend/correct/update their information to ensure it is accurate, timely and complete to the extent reasonably necessary to assure fairness when it is used to make a determination about them:

a. ☒ The PII collected for use in the system is NOT used to make adverse determinations about an individual's rights, benefits, and privileges under federal programs.

b. ☐ The records maintained in the system are used to make adverse determinations and (*select one*) ☐ are ☐ are not exempt from the access provisions in the Privacy Act, 5

U.S.C. 552a(d).

c. ▣ OCC has published regulations in place describing how individuals may seek access to and amendment of their records under the Privacy Act. *The Treasury/bureaus FOIA and Privacy Act disclosure regulations can be found at 31 C.F.R. Part 1, Subtitle A, Subparts A and C.*

d. ☐ Individuals who provide their information directly to OCC for use in the system are provided notice of the adverse determination and an opportunity to amend/correct/ update their information *[choose one]* ☐ before ☐ after it is used to make a final, adverse determination about them. This is accomplished by [*describe **here** how this process works and the protections in place, including redress/appeals processes; if notice is provided **after** an adverse determination is made, explain **here** why notice could not be provided **before** a determination was made, and the protections in place*]:

e. ☐ Individuals who provide their information directly to OCC for use in the system are expressly told at the point where the information is collected that they need to keep their information accurate, current and complete because it could be used to make adverse determinations about them. This is accomplished by [*describe **here** how/where/when individuals are told they need to keep their information updated before it is used to make adverse decisions about them; include the exact language provided to the individuals*]:

f. ☐ All manual PII data entry by federal employees/contractors is verified by a supervisor or other data entry personnel before it is uploaded to the system. This is accomplished by:

g. ▣ Other:
OCC published regulations describing how individuals may seek access to and amendment their records under the Privacy Act. TheTreasury/bureaus FOIA and Privacy Act disclosure regulations can be found at 31 C.F.R. Part 1, Subtitle A, Subparts A and C.

### *Technical controls*

a. ☐ No additional technical controls are available to ensure accuracy, relevance, timeliness and completeness.

b. ☐ Automated data feeds are used to refresh/update the information in the system (where the system is reliant on updates from another system). These automated data feeds occur:

c. ☐ Technical and/or administrative controls put are in place to ensure that when information about an individual is acquired from multiple sources for maintenance in a single file about a particular individual, it all relates to the same individual. This is accomplished by:

d. ☐ Address verification and correction software:

e. ▣ Other:
Active Directory is the single-source system of record for user accounts/records.

## Section 4.2 Data-Mining

### Section 4.2(a) Is the PII maintained in the system used to conduct data-mining?

1. ☒ The information maintained in this system or by this project ***is not*** used to conduct "data-mining" activities as that term is defined in the 9-11 Commission Act. Therefore, no privacy or civil liberties issues were identified in responding to this question.

2. ☐ The information maintained in this system or by this project ***is*** used to conduct "data-mining" activities as that term is defined in the 9-11 Commission Act. This system is included in Treasury's annual report to Congress which can be found on the external Treasury privacy website.

3. ☐ The information maintained in this system or by this project ***is*** used to conduct "data-mining" activities as that term is defined in the 9-11 Commission Act, but this system is not included in Treasury's annual report to Congress which can be found on the external Treasury privacy website. This system will be added to the next Treasury Data-mining report to Congress.

## Section 4.3 Computer Matching

### Section 4.3(a) Records in the system used in a computer matching program

1. ☐ The PII maintained in the system ***is not*** part of a Privacy Act system of records.
2. ☒

The information maintained in the system ***is*** part of a Privacy Act system of records, but ***is not*** used as part of a matching program.

3. ☐ The information maintained in the system ***is*** part of a Privacy Act system of records and ***is*** used as part of a matching program. [*If whether a Matching Agreement was executed and published as required by the CMPPA/Privacy Act; if no Matching Agreement was executed, please explain here why*]:

### Section 4.3(b) Is there a matching agreement?

1. ☒ N/A

2. ☐ There is a matching agreement in place that contains the information required by Section (o) of the Privacy Act.

3. ☐ There is a matching agreement in place, but it does not contain all of the information required by Section (o) of the Privacy Act. The following actions are underway to amend the agreement to ensure that it is compliant.

### Section 4.3(c) What procedures are followed before adverse action is taken against an individual who is the subject of a matching agreement search?

1. ☒ N/A

2. ☐ The bureau or office that owns the system conducted an assessment regarding the accuracy of the records that are used in the matching program and the following additional protections were put in place:
   a. ☐ The results of that assessment were independently verified by:
   b. ☐ Before any information subject to the matching agreement is used to suspend, terminate, reduce, or make a final denial of any financial assistance or payment under a Federal benefit program to an individual:
      i. ☐ The individual receives notice and an opportunity to contest the findings; **OR**
      ii. ☐ The Data Integrity Board approves the proposed action with respect to the financial assistance or payment in accordance with Section (p) of the Privacy Act before taking adverse action against the individual.

3. ☐ No assessment was made regarding the accuracy of the records that are used in the matching program.

## Section 4.4: Information sharing with external (i.e., outside OCC) organizations and individuals

### Section 4.4(a) PII shared with/disclosed to agencies, organizations or individuals outside OCC

1. ▣ PII maintained in the system is ***not*** shared with agencies, organizations, or individuals external to Treasury.

2. ☐ PII maintained in the system ***is*** shared with the following agencies, organizations, or individuals external to the OCC:

3. ☐ All external disclosures ***are*** authorized by the Privacy Act (including routine uses in the applicable SORN).

### Section 4.4(b) Accounting of Disclosures

***Making the Accounting of Disclosures Available***

1. ☐ The records are not maintained in a system of records subject to the Privacy Act so an accounting is ***not*** required.

2. ▣No external disclosures are made from the system.☐ The Privacy Act system of records maintained in the system ***is*** exempt from the requirement to make the accounting available to the individual named in the record. Exemption from this requirement was claimed because:
3. ☐ The Privacy Act system of records maintained in the system is ***not*** exempt from the requirement to make the accounting available to the individual named in the record and a log is maintained regularly. The log is maintained for at least five years and includes the date, nature, and purpose of each disclosure (not including intra-agency disclosures and FOIA disclosures) of a record to any person or to another agency (outside of OCC) and the name and address of the person or agency to whom the disclosure is made.

4. ☐ The Privacy Act system of records maintained in the system is ***not*** exempt from the requirement to make the accounting available to the individual named in the record and

a log is ***not*** maintained regularly, but is capable of being constructed in a reasonable amount of time upon request. The information necessary to reconstruct the log (i.e., date, nature, and purpose of each disclosure) is maintained for at least five years.

### Section 4.4(c) Obtaining Consent Prior to New Disclosures Not Authorized by the Privacy Act

***Obtaining Prior Written Consent***

1. ☐ The records maintained in the system of records are only shared in a manner consistent with one of the 12 exceptions in the Privacy Act, including the routine uses published in the Federal Register.

2. ☐ If a situation arises where disclosure (written, oral, electronic, or mechanical) must be made to anyone outside of the OCC who is not listed in one of the 12 exceptions in the Privacy Act (including the published routine uses), the individual's prior written consent will be obtained where feasible and appropriate.

## Section 5: Compliance with federal information management requirements

### Section 5.1: The Paperwork Reduction Act

1 ☐ The system maintains information obtained from individuals and organizations who are not federal personnel or an agency of the federal government (i.e., outside the federal government)

2 ☐The system involves a new collection of information in identifiable form for 10 or more persons from outside the federal government.

3 ☐ The system completed an Information Collection Request ("ICR") and received OMB approval.

4 ☐ The system did not complete an Information Collection Request ("ICR") and receive OMB approval because:

### Section 5.2: Records Management - NARA/Federal Records Act Requirements

1. ▣

The records used in the system are covered by a NARA's General Records Schedule (GRS). The GRS is:

NARA General Records Schedule (GRS) 5.8, item 010; Temporary: Destroy 1 year after resolved, or when no longer needed for business use, whichever is appropriate.

2. ☐ The records used in the system are covered by a NARA approved Treasury bureau Specific Records Schedule (SRS). The SRS:

NARA General Records Schedule (GRS) 5.8, item 010

3. ☐ On the system owner sought approval from NARA for an SRS and is awaiting a response from NARA:

4. ☐ The system owner is still in the process of developing a new records schedule to submit to NARA.

## Section 5.3: E-Government Act/NIST Compliance

1. ▣ The system is a federal information system subject to FISMA requirements.

2. ▣The system last completed an SA&A and received an ATO on: 08/17/2021

3. ☐This is a new system has not yet been authorized to operate. The expected to date for receiving ATO is:

4. ▣ The system maintains access controls to ensure that access to PII maintained is limited to individuals who have a need to know the information in order to perform their official OCC duties.

5. ▣ All OCC security requirements are met when disclosing and transferring information (e.g., bulk transfer, direct access by recipient, portable disk, paper) from the Treasury system to internal or external parties.

6. ▣ This system maintains an audit log of system users to ensure they do not violate the system and/or OCC Rules of Behavior.

7. ☐ This system has the capability to identify, locate, and monitor individuals or groups of people other than the monitoring of system users to ensure that they do not violate the system's rules of behavior.

## Section 5.4: Section 508 of the Rehabilitation Act of 1973

1. ☐ The system will ***not*** involve the development, procurement, maintenance or use of EIT as that term is defined in Section 508 of the Rehabilitation Act of 1973 (as amended in 1998)?

2. ▣ The system ***will*** involve the development, procurement, maintenance or use of EIT as that term is defined in Section 508 of the Rehabilitation Act of 1973 (as amended in 1998)? *If checked:*

3. ☐ The system complies with all Section 508 requirements, thus ensuring that individuals with disabilities (including federal employees) have access and use (including access to privacy and civil liberties policies) that is comparable to that which is available to individuals who do not have disabilities.

4. ▣ The system is not in compliance with all Section 508 requirements. The following actions are in progress to ensure compliance:

   https://docs.servicenow.com/bundle/accessibility/page/administer/accessibility-508-compliance/concept/available-accessibility-conformance-reports.html

## Responsible Officials Approval Signature

Ron Shelden

Privacy Program Manager

Date signed: 10/21/2022