



Privacy Impact Assessment (PIA)

FM & HR IT Services (ICS)

FM IT Services

ImageNow

**Subsystem of Ancillary Financial
Applications (AFA)**

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Abstract

ImageNow is the subsystem within the Ancillary Financial Applications (AFA) at GSA that serves as the Office of the Chief Financial Officer's (OCFO) imaging/workflow solution. ImageNow allows users in the Payroll Services Branch, Accounts Payable and customer agencies to annotate metadata to scanned images, and search and view documents (i.e., invoices, property records, deeds, transfers) that have been scanned/stored. ImageNow also provides workflow capabilities based on business rules, which are primarily used in Payroll. ImageNow includes individuals' names or other unique identifiers in conjunction with other data elements such as gender, birth date, age, marital status, spouse and dependents, home e-mail address, home address, home phone number, health records, Social Security Number, Employer Identification Number (also known as a "tax identification number"), payroll deductions, banking information, personal credit card information, and similar personal information. The individuals include Federal employees, contractors, and spouses of employees for the Child Subsidy Program.

Overview

ImageNow replaced the paper-based financial document filing system within GSA Office of Chief Financial Officer (OCFO). The application is managed by the Office of Corporate IT Services (IC) on behalf of OCFO, which is the business owner. IC manages the financial application within the FISMA system boundary of the Ancillary Financial Applications (AFA) and the approving official is the Associate CIO of the Office of Corporate IT Services. The FM & HR IT Services Division within IC manages this application and provides security as well as enhancement and bug fix support through a standard system development lifecycle (SDLC) and change management process.

ImageNow supports the record management and retention for financial documentation supporting a number of GSA's financial processes including payroll, childcare subsidy programs, and vendor invoices. The document images are organized in virtual "drawers" in order to provide role-based access to types of documents by offices and prevent the disclosure of sensitive information to personnel who do not have a need to know. The end users use the application to scan the documents and enter "metadata" about the document being stored, for example Invoice #, Invoice Amount, Customer Name, and Batch Id.

Personally identifiable information (PII) may be present in the images that are captured. For example, an invoice for a sole-proprietorship may include the individual's Social Security Number (SSN) as the tax identification number. In addition, the system automatically indexes images with data in other systems such as the Payroll, Accounting, and Reporting (PAR) system. This index data is in the ImageNow database and associated with the images. The OCFO has a quality assurance program in place to ensure the accuracy and completeness of scanned images and the indexing information (metadata discussed previously).

ImageNow is managed within the AFA FISMA system using Moderate FISMA controls including but not limited to encryption of data in transit across the network layers. The system is

inside the GSA network and thus protected from external access with the existing GSA intrusion detection devices and firewalls. The application has implemented role-based access to allow users to only see the images that are relevant to their work. Information is organized into drawers and personnel are provided access to drawers where they have a need to know. For example, all invoice images for an application related to Outleases are in a drawer named Outlease. Only personnel in GSA financial management with a need to know outlease data will be provided access to this drawer. GSA employees submit requests into the Enterprise Access Request System (EARS) to request access to the ImageNow Subsystem SSP and the AFA SSP for more information about the protections in place and how the security controls help to mitigate potential risks to privacy.

ImageNow shares information with the Pegasys financial management system (Accounts Receivable/Billing and Accounts Payable modules) hosted at the United States Department of Agriculture (USDA). GSA needs to share information with Pegasys (USDA) to provide the softcopy version of a paper invoice. In addition, the ImageNow application shares data internally with many of the AFA subsystems inside the FISMA system boundary for the purposes of sharing images allowing users to see the invoices or other images of paper data in order to perform their job functions. Lastly, ImageNow shares data with the Payroll, Accounting, and Reporting (PAR) system so that GSA employees may be billed or paid appropriately.

ImageNow allows other AFA applications to retrieve images so they can be displayed to users. The applications within the AFA boundary include:

- Child Subsidy (Quadra): these users are required to review employee subsidy applications and tax information for historical records. New images are not currently maintained for Child Subsidy in ImageNow.
- The following systems maintain copies of invoices in the system:
 - FEDPAY (Federal Supply Service Payment System)
 - Invoice Search
 - Visual Invoice Tracking and Payment (VITAP)
 - Pegasys Online Disbursement Review (POLDR)
 - Utilities
 - Web Vendor

The following systems are outside the AFA boundary and retrieve images from ImageNow as well:

- Payroll, Accounting, and Reporting (PAR)
- Pegasys (at USDA)

ImageNow is a COTS product from "Perceptive Content" version 7.1.1585.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the application in question?

48 CFR 1232.7002 Invoice and Voucher review and approval – provides for the collection of invoices for contracts and the review of these by the government.

5 CFR 792.204 - Agency responsibilities; reporting requirement. Used by the Child Subsidy Program for tracking the utilization of funds. The images in ImageNow are used for review and validation of the database entries in the Child Subsidy program.

While an SSN may be collected as part of the invoice data, it is not explicitly required by the application. The employer identification number is requested but if vendors choose to use their SSN instead, they can enter it.

1.2 What Privacy Act System of Records Notice(s) (SORN(s)) applies to the information?

The ImageNow system is referenced in SORN GSA/PPFM-12 “ImageNow,” available at: FR Doc No: E9-19102, Federal Register Volume 74, Number 152 (<https://www.gpo.gov/fdsys/pkg/FR-2009-08-10/html/E9-19102.htm>).

1.3 Has a System Security Plan (SSP) been completed for the information system(s) supporting the application?

The Ancillary Financial Applications (AFA) FISMA system was approved with an Authority to Operate (ATO) on September 21, 2016 and is in the process of being renewed. The system is a Moderate system and will be approved for three years on or before September 20, 2017.

1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

As stated in GSA PPFM-12, the data in ImageNow will be stored indefinitely. At a minimum NARA requires retention for at least 6 years after contracts expire for financial management records.

1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

There are no standard forms that collect data from the public for this system. The data stored in ImageNow are just scanned images or documents provided and are not forms

subject to the Paperwork Reduction Act.

Section 2.0 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.

2.1 Identify the information the application collects, uses, disseminates, or maintains.

ImageNow captures information about the following individuals:

- Federal employees part of the Child Subsidy program; this data would contain information about members of the public in regards to spouses and children
- Contractors – this data contains members of the public who submit invoices to GSA and provide personal information as part of the invoice.

The following information is captured on these individuals by storing images of documents as well as extracting data from the documents into metadata fields in the ImageNow database:

- employee by name or other unique identifier
- gender,
- birth date,
- age,
- marital status,
- spouse and
- dependents,
- home e-mail address,
- home address,
- home phone number,
- cell phone number,
- work phone number,
- health records,
- Social Security Number (only captured in the image, not in the database as described in Section 2.2),
- Employer Identification Number,
- payroll deductions,
- banking information,
- personal credit card information,

The ImageNow system takes in documents and extracts relevant data, allowing end users with access to do so to update in the database related to the image being processed whenever an inconsistency is recognized.

ImageNow receives a synchronization of invoice numbers in Pegasys through a background

database job. The background job matches certain attributes of the image with information in Pegasys to provide the Pegasys invoice number into the ImageNow database. This allows for Pegasys users to retrieve the invoice images upon request.

2.2 What are the sources of the information and how is the information collected for the application?

Source documents are provided by employees (for Child Care Subsidy), vendors (for invoices), and internal business users (other image types related to financial management). The individuals whose data may be on the documents do not interact with the system directly since the system is a paper / form archival and retrieval system. Individual's data may be extracted from the forms (documents) and entered as records in the ImageNow database, however SSNs are not one of the metadata fields in that database, decreasing the privacy risk to individuals. In order to extract the SSNs, a threat would have to obtain the documents and visually inspect the document. Cyber threats would target more easily extractable sources of data.

Documents are scanned by the business users directly into the product in what is referred to as a "Capture." The data is organized into drawers such that access to the documents can be controlled based on user role.

2.3 Does the application use information from commercial sources or publicly available data? If so, explain why and how this information is used.

The system is a commercial system, but does not use commercial sources of data.

2.4 Discuss how accuracy of the data is ensured.

When the document is captured into the system, it is set to a state of "Ready" for a quality assurance (QA) check. The OCFO staff checks the documents against the associated records. Any mis-captured information is corrected or the image is rescanned if the quality has been affected during the capture process. The OCFO staff checks the data against the paper copy or digital copy of the document being entered in the system.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: Role-based access may not be implemented and updated in accordance with with GSA-defined roles. If the role-based access is not implemented appropriately, there is a risk that personal data could be exposed to people who are not authorized to see a particular data type.

Mitigation: ImageNow system owners have reviewed and approved the roles for ImageNow and which drawers/folders that role can access. The roles are loaded into the Enterprise Access Request System (EARS). Users who require access to ImageNow must request access to a specific role and be approved by their supervisor and the

Information System Security Officer. Access to the role is granted only after approval of the request. The access of roles to drawers / folders remains constant and people are added to the roles. The roles, EARS requests, and accounts assigned to roles are reviewed annually to confirm that there are no misalignments.

Section 3.0 Uses of the Information

The following questions require a clear description of the application's use of information.

3.1 Describe how and why the application uses the information.

The following personal information is required for the administration of the Child Subsidy program:

- employee by name or other unique identifier
- gender,
- birth date,
- age,
- marital status,
- spouse and
- dependents,
- home e-mail address,
- home address,
- home phone number,
- cell phone number,
- work phone number,
- health records,
- Social Security Number (SSN), (only captured in the image, not in the database)
- Employer Identification Number,
- payroll deductions,
- banking information,
- personal credit card information,

The SSN is used for tax identification purposes in the Child Subsidy program and relates to the payroll processing. This is stored in the PAR system database, and only in ImageNow as part of an image.

For invoice capture, items such as a person's name, banking information, credit card information, and a SSN are captured only when a vendor is a sole-proprietorship using their personal information for business purposes. The SSN may be included in the image, but is not captured in the database.

When invoices are related to a company that is not a sole proprietorship, these entries relate to business points of contact, business addresses, and business banking information, none of which is subject to the Privacy Act, because [corporations and organizations do not have any Privacy](#)

Act rights. In both cases, the data is captured or searching the invoices and relating the data to data in Accounts Payable and Accounts Receivable modules in Pegasys.

3.2 Does the application use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how GSA plans to use such results.

An automated process occurs to identify the image records that match a record in the PAR system and set the identifiers to correlate between PAR and ImageNow. The same is performed with Pegasys to align Accounts Receivables with the images in ImageNow. Searching for the images primarily occurs in PAR and Pegasys and the images are pulled up during those business processes. The ImageNow product also provides attributes of the images to be searched and displayed. There are a small number of attributes that are searchable for the images.

There are no complex algorithms or analysis performed in ImageNow creating any new records or processing the data. The system is simply a document management solution.

3.3 Are there other components with assigned roles and responsibilities within the system?

USDA Pegasys users access the ImageNow images through linkages between data elements in Pegasys and ImageNow. The same holds for Payroll (PAR) users.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: Potential inappropriate use of the images, for example sharing them with unauthorized users.

Mitigation: The information use descriptions are present in this PIA and the System of Record Notice FR Doc No: E9-19102, Federal Register Volume 74, Number 152 (<https://www.gpo.gov/fdsys/pkg/FR-2009-08-10/html/E9-19102.htm>). Personnel are trained on the use of the system and GSA employs automated tools to check for sensitive information with inappropriate sharing settings.

Section 4.0 Notice

The following questions seek information about the application's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

4.1 How does the application provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

Individual data that comes to the ImageNow system is submitted by an individual to the

ImageNow user base for the purposes of supplying information on forms related to payroll, child care subsidies or in the case of contractors, invoices or other contract-related paperwork. The individuals involved are aware of the purpose of submitting the paperwork and that it may be captured in GSA systems. The SORN outlines how the data is used and how to request access to their data. Data is loaded into ImageNow from other systems or by individuals. Privacy Act Notices are provided to the individuals [on the forms that capture PII](#).

4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the application?

The individuals whose information is captured do not directly use the system. Instead, Privacy Act Notices are provided to the individuals [on the forms that capture PII](#), providing an opportunity for informed consent. For example, a vendor who submits their invoice in accordance with a contract can expect to have their invoice captured in a system for archival purposes.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: Individuals may not know how the requested data will be protected, used and disclosed.

Mitigation: The SORN describes the intended and routine uses of the information as well as role-based access controls that are in place to prevent disclosure outside of the uses defined. Both the SORN and PIA are available on the GSA privacy web site and can be located via an Internet search for terms in this document. The GSA privacy website also includes points of contact for any questions members of the public may have. These resources are designed to help citizens / employees to identify the existence of the system and appropriate contacts if they have questions or concerns.

Section 5.0 Data Retention by the application

The following questions are intended to outline how long the application retains the information after the initial collection.

5.1 Explain how long and for what reason the information is retained.

ImageNow has two primary purposes:

1. Archival of images for paper and electronic documents to eliminate the need to manage paper file cabinets or external file structures.
2. Categorization of the documents as they relate to the systems that manage the

business processes such as the payroll system and financial management system.

As an archival system that must be available for research of past transactions and as such the data must be retained to support the data retention requirements of the systems using the data. GSA at this time does not archive any of the ImageNow data and all data is being retained. If this changes in the future, this document will be updated.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that GSA will run out of space if there is a surge of new documents being stored.

Mitigation: GSA monitors storage and is hosting ImageNow on virtual environments that can be quickly expanded if needed. Storage capacity is planned such that if there is a future “cap” on storage, GSA will be aware and can implement archival strategies well in advance of running out of storage for new images.

Section 6.0 Information Sharing

The following questions are intended to describe the scope of the application information sharing external to the Agency. External sharing encompasses sharing with other federal, state and local government and private sector entities.

6.1 Is information shared outside of GSA as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

ImageNow only shares the images (documents) it stores with external parties to include the USDA Accounts Receivable and Accounts Payable users. Internal sharing also occurs, but the sharing with the financial system hosted at USDA is the only external sharing that occurs. The Pegasys and ImageNow database synchronization routine ensures that documents in ImageNow can be referenced by their related transactions in Pegasys, the financial system. Users of Pegasys can display and see the documents during processing of financial transactions and in response to later inquiries. The Pegasys system allows the documents to be pulled and viewed by Pegasys users who are both within GSA and external to GSA.

6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

The routine uses of ImageNow in the SORN include the ability to support legal proceedings and claims where supporting information may be required to dispute the claim. The financial system must have references to paper and electronic statements as a paper trail to financial transactions. ImageNow supports that through its interface with the Pegasys financial system.

6.3 Does the application place limitations on re-dissemination?

The Information Sharing Agreement (ISA)/Memorandum of Understanding (MOU) with USDA governs the limitations on data access. In addition, the SORN states that access will be limited to those U.S. government employees that require this information to perform their assigned official responsibilities.

6.4 Describe how the application maintains a record of any disclosures outside of the Agency.

ImageNow has the capability to log the following activities with regard to which users performed actions and the time of action:

1. Documents viewed
2. Printed / Emailed / Exported Documents
3. Modification of document data
4. User access to both the ImageNow system and documents.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is the potential that external sharing via the network connections between GSA and USDA could be compromised and data could be leaked.

Mitigation: The system is a multi-tiered architecture where the database is not directly exposed. Standard FISMA Moderate controls are in place to protect the system including GSA intrusion detection software, firewalls, strong authenticators, and encrypted data transfers.

Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

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

Users request access to the system using GSA's Enterprise Access Request System (EARS). EARS forces the user to specify the roles they are requesting. All ImageNow roles have pre-defined drawers that they have access to. The request from the user is approved by the supervisor and the Information System Security Officer prior to a system administrator adding the user into the role requested. Approvals are only granted where the employee has a need to access the documents contained in the ImageNow drawers.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Individuals submit the documents that are stored in ImageNow by the users of the system. In the event that the individual wants to see the documents related to their records, the SORN directs them to contact the Program Manager listed in the SORN. In this way, the individual can review and provide alternative information if any discrepancies exist.

7.3 How does the application notify individuals about the procedures for correcting their information?

The SORN describes how to update information through the Program Manager. The individuals do not directly access the system.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: N/A – the individual is responsible for the accuracy of the documents they provide.

Mitigation: Any mis-captured data elements may be manually corrected by the end user or the image may be recaptured in its entirety

Section 8.0 Auditing and Accountability

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

8.1 How does the application ensure that the information is used in accordance with stated practices in this PIA?

ImageNow has the capability to log the following activities with regard to which users performed actions and the time of action:

1. Documents viewed
2. Printed / Emailed / Exported Documents
3. Modification of document data
4. User access to both the ImageNow system and documents.

Audit reviews are performed at the operating system level on a frequent basis to identify any anomalies of server-level activities. The ImageNow application logs may be reviewed if an incident occurs.

8.2 Describe what privacy training is provided to users either generally or specifically

relevant to the application.

All Federal Government employees and contractors receive annual general security awareness and privacy training. This is relevant to how ImageNow records are handled and users are trained to recognize the importance of protecting the records and documents stored in the system.

8.3 What procedures are in place to determine which users may access the information and how does the application determines who has access?

Users request access to the system using GSA's Enterprise Access Request System (EARS). EARS forces the user to specify the roles they are requesting. In ImageNow the roles have pre-defined drawers that they have access to. The request from the user is approved by the supervisor and the Information System Security Officer prior to a system administrator adding the user into the role requested. Approvals are only granted where the employee has a need to access the documents contained in the ImageNow drawers.

The roles define whether the user has read-only or write privileges. The read/write privileges may change for different drawers in the system.

8.4 How does the application review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within GSA and outside?

All MOUs are reviewed by the system owner, program manager, Information System Security Officer, Information Owner, and counsel and then sent to A&A Review Team for formal review.