

Department of the Treasury  
**BUREAU OF ENGRAVING AND PRINTING**

**Mutilated Currency Tracking System  
(MUTS)**



**September 30, 2016**



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## Privacy Impact Assessment (PIA)

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### **B. System Application/General Information**

1. Does this system contain any PII? [ ] No [X] Yes

2. What is the purpose of the system/application?

The Office of Financial Management (OFM), Mutilated Currency Division (MCD) uses the Mutilated Currency Tracking System (MUTS) to track requests for examination of mutilated currency submitted to the Bureau of Engraving and Printing (BEP) for evaluation and possible redemption. OFM uses the Request for Examination of Mutilated Currency for Possible Redemption Form (BEP Form 5283) to collect personally identifiable information directly from members of the public including individuals, institutions, and executors/administrators (“requesters”). The data provided on BEP Form 5283 is used to populate MUTS, which helps with the entire process from receiving the request, processing the request, reimbursing the amount requested, and tracking the payment status of the request.

BEP Form 5283 is available to requesters on BEP’s public web site MoneyFactory.gov. Requesters will complete the form on-line, and print, and mail it to the BEP. BEP Form 5283 makes use of the Adobe LiveCycle capabilities to generate a barcode in the form. Once the form is received at the BEP, the barcode is scanned and the information provided in BEP Form 5283 is populated into the MUTS. This process removes the potential for data entry errors when importing the data manually from the form to the IT system.

3. What legal authority authorizes the purchase or development of this system/application?

5 U.S.C. § 301, 12 U.S.C. § 413, 31 U.S.C. §§ 321, 5118, 3332, 5120 and 31 C.F.R. Part 100.

4. Under which SORN does the system operate? (Provide name and number)

System of Records Notice, BEP/Treasury .046, Automated Mutilated Currency Tracking System, 78 Fed. Reg. 22619 (April 16, 2013). This SORN will be amended to include the new data elements and routine uses introduced with this upgrade.

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### **C. Data in the System**

1. What categories of individuals are covered in the system? (e.g., employees, contractors, taxpayers, other)

Individuals, institutions, and executors/administrators submitting requests for examination of mutilated currency for possible redemption.

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### 2. What are the sources of information in the system?

#### a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other sources?

There are two types of data in MUTS; data provided by the requester on BEP Form 5283 and data generated during the MUTS workflow as the request is processed. The source of the information on the BEP Form 5283 is the requester submitting the mutilated currency request to the BEP. Any data not provided will be left blank. Other sources will not be used to populate these fields. Data generated during the MUTS workflow as the request is processed is provided by BEP and Treasury personnel involved in the process.

#### b. What Federal agencies are providing data for use in the system?

The Bureau of the Fiscal Service manages the Secure Payment System (SPS) which is used to pay the redemption of the mutilated currency submitted for evaluation. MUTS interacts with SPS to request and track the status of the payment.

#### c. What state and/or local agencies, tribal governments, foreign governments, or international organizations are providing data for use in the system?

No state and/or local agencies, tribal governments, foreign governments, or international organizations will provide data for use in BEP Form 5283 or MUTS.

#### d. From what other third party sources will data be collected?

The initial data requested on BEP Form 5283 will not be collected from any third party source. Data is only requested from the individual who is submitting the request for examination of mutilated currency.

Data generated in the processing of the request will come from BEP personnel assigned responsibilities for the request evaluation and the SPS system provided by the Bureau of the Fiscal Service during the payment process.

#### e. What information will be collected from employees, government contractors and consultants, and the public?

The data provided in BEP Form 5283 forms the basis for the MUTS process. The following data is provided by requesters in BEP Form 5283:

- Individual (Check Box); or
- Institution (Check Box); or
- Executor/Administrator for Deceased Individual (Check Box);
- Last Name ;

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- First Name;
- Middle Initial;
- Institution Name;
- Deceased Full Legal Name;
- United States of America (Check Box); or
- Outside of United States of America (Check Box)
- Address 1;
- Address 2;
- Address 3;
- City;
- State/US Territory/Province;
- Zip;
- Country;
- Phone Number;
- Phone Extension;
- Email Address;
- Estimated Total Amount of Currency;
- Bank Name;
- Bank Routing # (2);
- Bank Account # (2);
- Description Mutilated Currency Remnants (Text);
- Read Privacy Act Statement (Check Box);
- Read Certification Statement (Check Box);
- Signature; and
- Signature Date.

The MUTS workflow generates a significant amount of data associated with the processing of the request. This data is provided by BEP employees and contractors and the FMS SPS. The data elements are:

- Case Number;
- Open Date;
- Close Date;
- Delivery Code;
- Delivery Tracking Number;
- Denomination;
- Note Code;
- Number of Notes;
- Grade of Notes;
- Initial Examiner's Name;
- Current Examiner's Name;
- Committee Examiner's Name;
- Committee Verifier's Name;
- IRS Amount;

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- Remitted Amount;
- Payment Status;
- Location Code;
- Assigned To Name;
- Transferred Date;
- Archived Date;
- Payee Name;
- SPS Schedule Number; and
- SPS Schedule Line Number.

### 3. Accuracy, Timeliness, and Reliability

- a. How is data collected from sources other than from Treasury records going to be verified for accuracy?**

Each individual validates the data provided when signing the BEP Form 5283.

The Examiner, Reviewer, and Request Processors review the data entered in the MUTS process several times during the examination process.

- b. Is completeness required?**  No  Yes

- c. What steps or procedures are taken to ensure the data is current and not out-of-date?**

The data generated during the processing, by the nature of the workflow process, is the most current data at that time. There are procedures to update the data in case the request changes or an error is detected. These include having new updated data provided by the requester through a new BEP Form 5283 input, telephone conversation, or response to an email query.

- d. Are the data elements described in detail and documented?**  No  Yes

**If yes, what is the name of the document?**

Requesters can contact the BEP using the general MCD email address.

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### D. Attributes of the Data

- 1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Yes. BEP's regulations (31 CFR Part 100, 79 Fed. Reg. 30724 (2014)) on exchange of mutilated currency require submitters to provide personal banking information since all

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mutilated currency redemptions of \$500.00 or more shall be made via Electronic Funds Transfers (EFT) by the Department of the Treasury, Bureau of the Fiscal Service in accordance with the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3332(e). This practice will help deter fraud and abuse in mutilated currency submissions. The BEP has encountered some schemes where currency is mutilated intentionally in an apparent attempt to defraud the government. The intentionally mutilated currency is often intermingled with other bills in an apparent effort to thwart detection. The data requested on BEP Form 5283 is relevant and necessary to identify the individual submitting the request, document how the currency came to be mutilated, and provide bank account information to allow the payment of the request.

The data generated in the MUTS workflow is required to track the status of the request and payment.

2. **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**  No  Yes
3. **Will the new data be placed in the individual's record?**  No  Yes
4. **Can the system make determinations about employees/members of the public that would not be possible without the new data?**

No.

5. **How will the new data be verified for relevance and accuracy?**

Data entered during the MUTS process is reviewed several times in the process by the Examiner, Reviewer, and Request Processors.

6. **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

Access is limited to personnel approved by the Office of Financial Management, Mutilated Currency Division. There are both logical and physical controls in place to protect access to the data.

Records are maintained in locked file cabinets. Only authorized users have access to the area that houses the file cabinets. Rooms are locked when not manned by cleared personnel.

The MUTS performs Authentication and Authorization using Active Directory to ensure only approved personnel have access to the data.

7. **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

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N/A. Processes are not being consolidated.

- 8. How will the data be retrieved? Is the data retrieved by a personal identifier? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

The data in BEP Form 5283 and MUTS is retrieved by:

- Case Number,
- Delivery Tracking Number,
- Requester Name and,
- Deceased Individual Name.

- 9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

There are only a few standard reports produced by the system that contain any PII elements. Four of these contain the name of the requester. These four reports address:

- Examiner Report - contains all information about a specific case;
- Awarded Amounts – Includes name and address of the requester;
- Settled Amounts – Includes name and address of the requester;
- Status of Request by Type – Includes name and address of the requester and the name of the Examiner.

Six reports deal with tracking the status of work in the workflow and do not contain any information about the requester. However, they do contain the names of the BEP personnel working on the case.

These reports are available to BEP personnel approved to use the MUTS and are required to manage the workflow in MUTS.

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### **E. Maintenance and Administrative Controls**

- 1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

N/A. The system is only operated at the DC Facility.

- 2. What are the retention periods of data in the system?**

Records are managed in accordance with National Archives and Records Administration approved BEP Records Schedule N1-318-04-16 Currency Standards.



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- 3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

Paper records approved for destruction in accordance with applicable NARA approved BEP Record Schedule are destroyed by shredding or burning.

Electronic records approved for destruction in accordance with applicable NARA approved BEP Record Schedule are electronically erased using accepted techniques.

The procedures used to facilitate this process are documented in BEP Circular No. 80-05, Records Management Program (2006); BEP Circular No. 80-05.3, Records Storage (2007); and BEP Circular No. 80-05.4, Policies and Procedures for Electronic Records and Email (2006).

- 4. Is the system using technology in ways the office or bureau has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)? If yes, explain.**

Yes. The revised BEP Form 5283 is being implemented with features provided by Adobe LiveCycle Forms. The Adobe Form version of the BEP Form 5283 can be filled out on line and printed. When printed, the data on the form is stored in a machine readable barcode. The barcode is read by MUTS and the data on the form is automatically added to the MUTS database. This eliminates all errors resulting from hand entering the data from the form to the IT system.

- 5. How does the use of this technology affect public/employee privacy?**

This technology ensures the data provided by the individual completing the form is entered exactly as the person entered it with no human error.

- 6. Will the system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

Yes. MUTS captures an individual's name, address, and phone number. This would provide the capability to identify but not locate or monitor an individual.

- 7. What kind of information is collected as a function of the monitoring of individuals?**

N/A.

- 8. What controls will be used to prevent unauthorized monitoring?**

N/A.

- 9. Under which SORN does the system operate? (Provide name and number)**

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System of Records Notice, BEP/Treasury .046, Automated Mutilated Currency Tracking System, 78 Fed. Reg. 22619 (April 16, 2013).

**10. If the system is being modified, will the SORN require amendment or revision? Explain.**

This SORN will be amended to include the new data elements captured in BEP Form 5283 and MUTS and other routine uses. The BEP will provide information to the Department of the Treasury, Bureau of the Fiscal Service to process mutilated currency requests payments of \$500.00 or more via electronic funds transfer (EFT).

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### F. Access to Data

**1. Who will have access to the data in the system? (e.g., contractors, users, managers, system administrators, developers, others).**

Access is limited in BEP to employees in Office of Financial Management, Mutilated Currency Division and the contractors responsible for maintaining the system. In addition, the Department of the Treasury, Bureau of the Fiscal Service will have access to all data to process request payments. Law enforcement officials or third parties will also have access to the data for purposes of investigation or related criminal activity or for purposes of seeking civil judgment.

**2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

BEP employees in Office of Financial Management, Mutilated Currency Division and contractors will have access to MUTS on a need-to-know basis for the performance of their official duties. Access to MUTS is requested by the individual and approved by the Chief of the Office of Financial Management, Mutilated Currency Division before any access is granted.

**3. Will users have access to all data on the system or will the user's access be restricted? Explain.**

Approved Users will have access to all of the information in MUTS.

**4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? List procedures and training materials.**

Users participate in the mandatory Annual Privacy Awareness Training sponsored by the Department of the Treasury, Office of Privacy and Civil Liberties (OPCL) and the Records Management-Employees and Contractors Training sponsored by the Department of the Treasury, Office of Privacy, Transparency, and Records (OPTR) to prevent the

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misuse of data. These trainings are available annually on the Treasury Learning Management System (TLMS).

**5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system?**

Yes. BEP contractors designed, developed, and maintain MUTS.

**6. Do other systems share data or have access to the data in the system? If yes, explain.**

MUTS data may be shared with local, county, state, and federal law enforcement agencies responsible for investigating and/or prosecuting the violation of a statute, rule, regulation, order, or license when the BEP becomes aware of a potential violation of civil or criminal law or regulation.

MUTS shares data with the Bureau of the Fiscal Services' Secure Payment System for purposes of requesting and tracking payments.

**7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

Chief, Office of Financial Management.

**8. Will other agencies share data or have access to the data in this system?**

Federal             State             Local             Other

**9. How will the data be used by the other agency?**

The Department of the Treasury, Bureau of the Fiscal Service will use the data to process request payments. The data may also be used to perform law enforcement investigations and/or prosecute the violation of a statute, rule, regulation, order, or license.

**10. Who is responsible for assuring proper use of the data?**

Chief, Office of Financial Management

