

**Department of the Treasury  
Bureau of Engraving and Printing  
Privacy Impact Assessment (PIA)**

**Use of Shredded U.S. Currency  
Program**



**May 29, 2015**



# Privacy Impact Assessment (PIA) Use of Shredded U.S. Currency Program

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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 purpose of this system of records is to establish a manual and electronic database that will facilitate the processing of requests to use shredded U.S. currency for artistic or commercial purposes. Individuals wishing to use shredded U.S. currency must request approval in writing from the BEP Office of Compliance - Destruction Standards and Compliance Division (OC). A written approval from the OC is required before the Federal Reserve Bank considers honoring currency residue requests. Records are for internal purposes only and will facilitate the approval process performed by the Chief, Office of Compliance.

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

The legal authorities are 12 U.S.C. § 413, 31 U.S.C. § 5120, Treasury Order 135-01, "Delegation of Authority and Responsibility for Destruction of Security Items", dated February 16, 2000, and Treasury Directive TD 19-06, "Delegation to the Director, Bureau of Engraving and Printing, for the Redemption and Destruction of Unfit Currency and the Destruction of Waste and Spoiled Items" dated February 29, 2000.

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

System of Records Notice Treasury/BEP .050, Use of Shredded U.S. Currency System, 80 Fed. Reg. 13995 (March 17, 2015).

The Use of Shredded U.S. Currency Program is not subject to the provisions of the Paperwork Reduction Act (PRA), 44 U.S.C. § 3401 *et. seq.* The collection of this information used to identify individuals does not require PRA clearance as it is not considered "information" under the PRA. See 5 C.F.R. § 1320.3(h).

The OC provides a Privacy Act Statement in accordance with 5 U.S.C. § 552a (e)(3). The Privacy Act Statement is available in BEP's website.

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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)

Members of the public who wish to use U.S. currency residue for artistic or commercial purposes.

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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?**

All information is provided by the individual.

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

None.

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

None.

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

None.

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

The requesters will provide the following contact information data:

- 1) Name (First, Last, MI);
- 2) Home Address (Street, City, State, Zip Code);
- 3) Home Phone Number;
- 4) Cell Phone Number;
- 5) Personal E-mail Address;
- 6) Name of Business;
- 7) Business Address (Street, City, State, Zip Code, Room Number);
- 8) Business Phone Number;
- 9) Business Email Address; and
- 10) Date of Request.

In addition, the request and the letter approving or disapproving the request will be collected. If there is more than one point of contact, some of the data elements may be repeated for each individual.

### **3. Accuracy, Timeliness, and Reliability**

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

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The only data collected comes directly from the individual. If the OC personnel processing the request have questions, they will interact with the requester to verify any required information.

b. Is completeness required?  No  Yes

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

If the OC personnel processing the request have questions, they interact with the requester to verify any required information.

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

If yes, what is the name of the document?

The data elements are described in BEP's website.

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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. The OC has determined that contact information is needed to inform their decision regarding the use of shredded currency.

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

The OC will derive new data by approving or disapproving the request and filing that data with the request.

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?

Yes. For example, the OC can link the name of the requester with the address or date of request.

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

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The OC does not verify the accuracy of the information but rather relies on the information provided by the individual. The OC personnel processing the request will interact with the requester to verify the accuracy of any required information if necessary.

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

Data is not being consolidated.

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

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.**

Hardcopy data is filed chronologically and retrieved by the date the request was received. Softcopy data is filed and retrieved by the requester's name.

The request, the envelope the request came in, and the response to the requester are all stored in a three ring binder in a locked file cabinet. In addition, these records are converted to a portable document format (pdf) and stored online in the BEP file system, befiles. The softcopies are stored by the name of the requester. The OC provides a response by regular mail or email, if an email address was provided. In either case, both the hardcopy and the PDF version are stored as indicated above.

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

No reports are generated. A letter approving or denying the request is generated for each request. Only personnel from the OC will have access to these letters.

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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?**

The program is only operated at the District of Columbia Facility (DCF).

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

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Records are retained in accordance with BEP Agency Specific Records Schedule No. 16 (N1/318/04/16) as required by the National Archives and Records Administration (NARA).

- 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 for disposal are destroyed by shredding, burning, or maceration. Records in electronic media are electronically erased using accepted techniques. Reports are kept in accordance with the BEP Agency Specific Records Schedule No. 16 (N1/318/04/16) as required by NARA.

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); BEP Circular No. 80-05.4, Policies and Procedures for Electronic Records and E-mail (2006).

The OC and the Office of Critical Infrastructure and IT Security are responsible for ensuring that records are preserved, records no longer of current use are promptly destroyed, retention schedules are implemented, and that the BEP complies with the recordkeeping requirements issued by the Department of the Treasury, the National Archives and Records Administration, the Office of Management and Budget, and the National Institute of Standards and Technology.

- 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.**

No.

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

A requester provides voluntarily some PII with their request which is used to process the request and to store and retrieve the data. The requester can be contacted using the information provided and their requested use of the currency residue can be ascertained.

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

Contact information provided by the requester can be used to identify and contact an individual. The data will not allow location or monitoring of an individual.

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

N/A. Individuals are not monitored.

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

N/A. Individuals are not monitored.

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

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

N/A.

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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).**

BEP employees in the OC will have access to the data.

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

Hardcopy data is stored in a three ring binder in a locked file cabinet. Only a single person has access to the locked file cabinet.

Softcopy data is stored in the OC file structure on bepfiles in a restricted access folder. Only personnel approved through the BEP IDM process are allowed access to this folder.

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

User access is restricted to the set of authorized users provided access to the restricted access folder stored in the OC file structure on bepfiles.

The hardcopy data is stored in a three ring binder in a locked file cabinet. Only a single approved OC employee has access to the locked file cabinet.

**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.**



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Access is restricted by the BEP IDM process to BEP employees that have a need to know the information and have been approved for access to the data.

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

No.

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

No. However, requesters will present their approval letter to the appropriate Federal Reserve Bank in order to receive the shredded U.S. currency.

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

Chief, Office of Compliance

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

No.

Federal     State                     Local                     Other

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

N/A

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

Chief, Office of Compliance

