



Bank Secrecy Act Information Technology Modernization (BSA ITMOD)

Privacy Impact Assessment (PIA) FinCEN Query

Version 2.1

January 16, 2013

Revision History

Revision Number	Change Effective Date	Description of Change	Change Entered By
0.1		Draft FinCEN Query PIA version.	
1.0	10/21/2010	Privacy Impact Assessment – Final FinCEN Query version.	
1.1	06/13/2012	Reviewed by FinCEN Privacy Administrator	Gayle Rucker
		Modified Section A	Andrea Livero-Scott
1.3	7/9/2012	Modified based on FinCEN Privacy Administrator Feedback	David Strich
1.4	7/17/2012	Reviewed by FinCEN Counsel's Office	Jacob Thiessen
1.5	07/20/2012	Reviewed by FinCEN Privacy Administrator	Gayle Rucker
1.6	07/25/2012	Removed a phrase. Page 13.	Quentin Robinson
1.7	07/30/12	Reviewed by FinCEN Counsel's Office	Jacob Thiessen
1.8	8/2/12	Reviewed and updated based on FinCEN Privacy Administrator and FinCEN Counsel comments.	David Strich
1.9	08/27/12	Reviewed and updated based on 08/24/12 meeting.	Gayle Rucker
2.0	12/21/2012	Renamed system owner and updated SORN requirement	Quentin Robinson
2.1	01/16/2013	Removed one sentence from Section F, #6	Gayle Rucker

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Privacy Impact Assessment (PIA) for FinCEN Query

Name of Project: Bank Secrecy Act (BSA) Information Technology Modernization (ITMOD)

Bureau: Financial Crimes Enforcement Network (FinCEN)

Project's Unique ID: TBD

Name of the system: FinCEN Query

Unique System Identifier (or Systems of Records Notification): 015-04-01-12-01-1018-00

A. CONTACT INFORMATION

- 1) **Who is the person(s) completing this document?** (Name, title, organization and contact information).

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- 2) **Who is the system owner?** (Name, organization and contact information).

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- 3) **Who is the system manager for this system or application?** (Name, organization, and contact information).

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- 4) **Who is the IT Security Manager who reviewed this document?** (Name, organization, and contact information).

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- 5) **Who is the Bureau Privacy Act Officer who reviewed this document?** (Name, organization, and contact information).

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- 6) **Who is the Bureau Privacy Program Administrator who reviewed this document?** (Name, organization, and contact information).

Name: Gayle Rucker
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- 7) **Has organizational privacy management information previously been provided with another PIA?**

Yes No N/A Enclosed Reference

Details* _____

- 8) **If 'Yes' to Question 7, has any of this information changed since the previous PIA was submitted? If NO, please provide the title & date of the previous PIA and proceed to Section B of the questionnaire.**

Yes Partial No N/A Enclosed Reference

Details* _____

- 9) **Who is the Reviewing Official?**

Name: Amy Taylor, FinCEN Chief Information Officer (CIO)
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B. SYSTEM APPLICATION/GENERAL INFORMATION

- 1) **Does this system contain any information about individuals?** *Individual* - means a citizen of the United States or an alien lawfully admitted for permanent residence.

Yes Partial No N/A Enclosed Reference

Details*

The following Personally Identifiable Information (PII) information will be stored in the FinCEN Query system:

- Name
- Social Security Number
- Address

- Phone
- Date of Birth
- Bank Account Number
- Country
- Passport Number
- Alien Registration Card
- Foreign ID
- Corporate ID
- Driver's License ID
- Financial Institutions
- Employer Identification Number
- Individual Tax Identification Number
- Issuer Identification Number
- Agency Name

a. Is this information identifiable to the individual?

Yes, FinCEN Query stores an indexed copy of the personally identifiable information contained in the Bank Secrecy Act System of Record (BSA SOR).

FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

b. Is this information about individual members of the public?

Yes, FinCEN Query stores an indexed copy of the personally identifiable information contained in the Bank Secrecy Act System of Record (BSA SOR).

FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

c. Is this information about employees?

Yes, FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

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

FinCEN Query is a custom-built web application within the BSA ITMOD Program designed to improve authorized users' ability to search on, access, and analyze BSA data. This tool is accessible to internal FinCEN users as well as external users, such as the Federal Bureau of Investigation and the Internal Revenue Service. There are several specific FinCEN Query capabilities shown in the table below.

Capabilities	Description
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Capabilities	Description
Robust Search Capabilities	Users can perform basic, advanced and quick searches. Search functionality can be as simple as entering a single value (e.g. Subject Last Name) or can be built to perform more complex searches with multiple fields and varied Boolean logic.
Create and Manage Searches	Users can add new and save frequently used searches storing PII.
Advanced Search	Users are offered options for manipulating search results including filtering, history, and exporting search results.
Powerful Transcript Views	Once a user has decided to view the details of a search result, the user has flexible ways to view high volumes of data including previous/next transcripts, pop-out transcripts, and/or bulk selection of specific transcripts for viewing from a large list of search results.
Download BSA Data	Users are able to download one or more BSA records based on their selection of specific records from the search results grid. Requests to download a transcript are captured by QAL.
Save Data to Query Audit Log (QAL)	Information entered into search fields within FinCEN Query to search BSA records will be stored in QAL. This information contains PII.
Manage Preferences	Users can change the default search view, quantity of search results returned, change their filters options, and manipulate columns displayed in their search results grid.

Users access FinCEN Query via the FinCEN Registered User Portal (RUP), which is a component of the Infrastructure, Portal, Identity and Security (IRIS) General Support System (GSS). Two-factor authentication is required to access the FinCEN Query application.

3) What legal authority authorizes the purchase or development of this System/application?

BSA information is collected under the authority of the Bank Secrecy Act (Titles I and II of Public Law 91-508, as amended, and codified at 12 U.S.C. § 1829b, 12 U.S.C. §§ 1951-1959, and 31 U.S.C. §§ 5311-5331). The regulations implementing the Bank Secrecy Act are found at 31 C.F.R. Chapter X. The authority to administer 31C.F.R. Chapter X has been delegated to FinCEN. The same information is also collected and managed under the separate authority of 31 U.S.C. § 310 that specifically permits electronic data services.

C. DATA IN THE SYSTEM

1) What categories of individuals are covered in the system?

FinCEN Query stores an indexed copy of personally identifiable information contained in the Bank Secrecy Act System of Record (BSA SOR). BSA data includes information on any individual identified to FinCEN via BSA reports such as a suspicious activity report, currency transaction report, currency and monetary instrument report, or other report that is submitted pursuant to BSA requirements and/or administration.

FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

2) What are the sources of the 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 source?

Yes Partial No N/A Enclosed Reference

Details*

FinCEN Query stores an indexed copy of personally identifiable information contained in the Bank Secrecy Act System of Record (BSA SOR). BSA data includes information on any individual identified to FinCEN via BSA reports such as a suspicious activity report, currency transaction report, currency and monetary instrument report, or other report that is submitted pursuant to BSA requirements and/or administration.

FinCEN Query stores some personally identifiable information collected directly from users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

b. Are Federal agencies providing data for use in the system?

Yes Partial No N/A Enclosed Reference

Details*

Yes. FinCEN Query stores an indexed copy of personally identifiable information contained in the Bank Secrecy Act System of Record (BSA SOR). BSA data includes information on any individual identified to FinCEN via BSA reports such as a suspicious activity report, currency transaction report, currency and monetary instrument report, or other report that is submitted pursuant to BSA requirements and/or administration.

Personal information concerning individual users of FinCEN Query has been provided by others in those users' agencies or organizations; some user agencies are Federal agencies. FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

c. Will Tribal, State and local agencies provide data for use in the system?

Yes No N/A Enclosed Reference

Details*

FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

Some personally identifiable information stored in the BSA SOR may come from state agencies, including State financial institution functional regulators. Personally identifiable information concerning individual users of FinCEN Query has been provided by others in those users' agencies or organizations; some user agencies are State, local and Tribal agencies.

d. Will data be collected from other third party sources?

Yes Partial No N/A Enclosed Reference

Details*

FinCEN Query stores an indexed copy of the personally identifiable information contained in the BSA SOR. The BSA SOR may collect data from third-party sources, but FinCEN Query does not.

e. What information will be collected from the employee and the public?

FinCEN Query stores an indexed copy of personally identifiable information contained in the Bank Secrecy Act System of Record (BSA SOR). BSA data includes information on any individual identified to FinCEN via BSA reports such as a suspicious activity report, currency transaction report, currency and monetary instrument report, or other report that is submitted pursuant to BSA requirements and/or administration.

FinCEN Query collects some personally identifiable information directly from users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

3) Accuracy, Timeliness, and Reliability

a. How are data collected from sources other than FinCEN records verified for accuracy?

FinCEN Query collects information about users and administrators of FinCEN Query, and information about the subjects of queries made through FinCEN Query. This information is provided by authorized and trusted and/or cleared staff of authorized government agencies and organizations, but it is not separately verified.

The BSA dataset maintained in the BSA SOR has already been verified through the BSA E-Filing system. Only authorized and trusted data providers (e.g., financial institutions, brokerages, casinos, and money services businesses) submit this data into BSA E-Filing system, which is then used by the BSA SOR to disseminate BSA data for querying/analysis.

b. How will data be checked for completeness?

See response to 3) a. above. The parameters in these queries are considered complete only the extent they are entered as complete by the end user. FinCEN does not separately check query parameters for completeness.

- c. Is the data current?** What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

Yes Partial No N/A Enclosed Reference

Details*

Scheduled jobs run on a daily basis (i.e. per 24 hours) to propagate all newly ingested BSA data to downstream dissemination systems, such as FinCEN Query. Query parameters used in querying data, and user information about the users of particular query parameters, are captured in real time.

- d. Are the data elements described in detail and documented?** If yes, what is the name of the document?

Yes Partial No N/A Enclosed Reference

Details*

Yes, the data elements are described in detail and documented in FinCEN Query's supporting documentation such as the Design Specification Report.

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 Partial No N/A Enclosed Reference

Details*

FinCEN Query is the primary mechanism for accessing/searching BSA data collected by the BSA E-Filing major application and third-party data sources. FinCEN Query makes BSA data available to Federal, state, and local law enforcement agencies; Federal, state and local regulatory enforcement and examination organizations; United States Attorney's Offices for investigative and analytical purposes; and Federal agencies conducting background investigations on employees and contractors.

FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

- 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?**

Yes Partial No N/A Enclosed Reference

Details*

FinCEN Query also makes available *existing* data collected by the BSA E-Filing System and maintained within the BSA SOR.

The only new data created by FinCEN Query is some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

3) Will the new data be placed in the individual's record?

Yes Partial No N/A Enclosed Reference

Details*

Information about users of FinCEN Query, and information about subjects being queried, is not routinely, regularly associated with the individuals to which that information pertains, although it can be so associated in connection with a specific inquiry about user activity or a networking notification (a message to two users that they have independently made queries about the same person).

With respect to the BSA data accessed through FinCEN Query, as new data on an individual is received through the BSA E-Filing system and from third party data sources, it will be associated with an individual record in the DCSD SOR and accessible through the FinCEN Query system. Both BSA E-Filing and DCSD SOR have been addressed in separate (PIAs).

4) Can the system make determinations about employees / public that would not be possible without the new data?

Yes Partial No N/A Enclosed Reference

Details*

FinCEN Query, in particular the information provided by users in the form of query parameters and stored in the system, can form the basis for investigations concerning unauthorized or inappropriate access to or disclosure of BSA information.

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

FinCEN Query stores some personally identifiable information about users of FinCEN Query consisting of the user identifier associated with query parameters used to obtain specific information. Query parameter information collected by the system is not verified for relevance or accuracy.

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

Details*

Data is not consolidated within the FinCEN Query system. BSA data that can be queried through FinCEN Query is consolidated in other FinCEN systems before it is made available to FinCEN Query.

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

Yes Partial No N/A Enclosed Reference

Details*

Data is not consolidated within the FinCEN Query system. BSA data that can be queried through FinCEN Query is consolidated in other FinCEN systems before it is made available to FinCEN Query.

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

Yes Partial No N/A Enclosed Reference

Details*

FinCEN Query stores some personally identifiable information about users of FinCEN Query, as is necessary, to record those users' submission and use of specific query parameters. This information includes the user's user identifier within FinCEN Query.

End users of FinCEN Query can retrieve BSA SOR information stored there d by any one or a combination of the PII information types outlined in the response to Question B.1.

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

Two types of reports will be available to end users of FinCEN Query:

- BSA Data Reports – Provide statistical and detailed information about BSA filing information. The reports are organized into three categories: General BSA Data Reports, Examination Reports, and Reports by Money Service Business Reports
- QAL Data Reports – Provide statistical and detailed information about user activities in the FinCEN Query application.

Only authorized FinCEN Query end users will have access to the reports based on the FinCEN Query user access profile they have been assigned.

10) Do individuals have an opportunity and/or right to decline to provide information?

Yes Partial No N/A Enclosed Reference

Details*

Employees of authorized user agencies wishing to use FinCEN Query have the opportunity to decline to provide the personal information necessary to obtain access to FinCEN Query; if

they do so, they cannot obtain access. This is disclosed to them in accordance with the Privacy Act of 1974. Once they obtain access, users of FinCEN Query do not have the opportunity to decline to provide information about their identities, or about the link between their identities and the queries that they make of BSA information.

11) Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?

Yes Partial No N/A Enclosed Reference

See answer above to #10.

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 will be maintained in all sites?

N/A – The production instance of FinCEN Query is operated at one location.

2) What are the retention periods of data in this system?

Details*

Existing FinCEN file plans are being revised to incorporate retention requirements for this new system. Once the National Archives and Records Administration approves the record retention schedule approved by the agency in April of 2012, the data will be disposed of as authorized in accordance with the schedule. Until then, FinCEN will treat all the records as permanent records, and thus not destroy any of them.

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?

Details*

Existing FinCEN file plans are being revised to incorporate retention requirements for this new system. Once the National Archives and Records Administration approves the record retention schedule approved by the agency in April of 2012, the data will be disposed of as authorized in accordance with the schedule. Until then, FinCEN will treat all the records as permanent records, and thus not destroy any of them.

4) Is the system using technologies in ways that FinCEN has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

Yes Partial No N/A Enclosed Reference

5) How does the use of this technology affect public/employee privacy?

FinCEN Query records the user name associated with any BSA queries entered into the system. The collection of this information in FinCEN Query is not new to FinCEN processes, thus there is no new effect on employee privacy.

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

Yes Partial No N/A Enclosed Reference

Details*

FinCEN Query provides for the ability to identify, locate, and monitor individuals (i.e. users of the FinCEN Query system) in two ways. Specifically:

- The identification and authentication mechanisms of FinCEN Query are configured to record the date, time and, user account of an individual accessing the FinCEN Query system, or any supporting software component (i.e. as a system administrator).
- All the parameters on queries processed by the FinCEN Query system, along with the user account of the individual who ran the query, are stored within a FinCEN Query database.

7) What kinds of information are collected as a function of the monitoring of individuals?

See response to Question E.6.

8) What controls will be used to prevent unauthorized monitoring?

FinCEN Query provides several controls to prevent unauthorized monitoring:

- Only authorized users are granted access to the FinCEN Query application based on business function and need-to-know. These users access the FinCEN Query application through the FinCEN Portal using their issued multi-factor authentication mechanism (i.e. Personal Identity Verification card or soft-certificate token).
- Only authorized FinCEN and Bureau of the Public Debt employees and contractors are granted system administration privileges.
- All data transmissions between the FinCEN Query application and end users are encrypted using a FIPS 140-2 compliant protocol.
- Auditing and logging has been enabled within all application tiers of FinCEN Query.
- All external agencies are required to agree to a Memorandum of Understanding with FinCEN prior to being granted access to FinCEN Query.
- All FinCEN Query users are required to read and agreed to Rules of Behavior prior to being granted access.
- User sessions are configured to automatically timeout after a specified period of time.
- All query activities is recorded by the system QAL.

9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

Treasury/FinCEN.001. The system is subject to the SORN requirements for a Privacy Act System of Records because it contains information about individuals (names, addresses, dates of birth, personal identifiers) and should be expected to be searched by name or personal identifier – as when it becomes necessary to determine whether any user has searched the database for some particular person. It was initially thought that existing FinCEN SORNs did

not entirely cover the system, as the system does not consist of information solely devoted to law enforcement (Treasury/FinCEN.001) or solely of BSA reports (Treasury/FinCEN.002, 003). However, FinCEN has republished its SORNs (October 1, 2012, 77 FR 60014), and these SORNs became effective November 5, 2012. These republished SORNs incorporated a number of changes, including an expansion of the coverage of Treasury/FinCEN.001 to include "every possible type of information that contributes to effective law enforcement and regulation of financial institutions ... including, but not limited to, ... queries and the results of queries made by FinCEN customers[.]" This language, in the opinion of the Privacy Act Officer, addresses the apparent gaps in coverage for information intended for use by regulatory agencies, and for non-BSA reports provided by third parties and made available to FinCEN customers for uses comparable to their use of BSA reports.

10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

Yes Partial No N/A Enclosed Reference

Details*

See answer to question E.9 above.

F. ACCESS TO DATA

1) Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)

Details:

FinCEN employees and contractors, as well as employees and contractors at the Bureau of the Public Debt (which hosts the FinCEN Query system), have access to the individual components that comprise the FinCEN Query system for development, maintenance, and system administration. In addition, information generated by FinCEN Query is accessible on request by authorized and authenticated Federal, state, and local law enforcement agencies; Federal and state regulatory and tax agencies, United States Attorney's Offices, ; and Federal agencies conducting background investigations on employees and contractors – all in order to be able to review the BSA data searching of their employees.

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

Details:

User provisioning procedures have been established for access to FinCEN Query by FinCEN employees and contractors (i.e. internal users) and by users at external agencies (i.e. external users). User provisioning procedures for internal users follow FinCEN user provisioning policy. In order for external users to obtain access, a Memorandum of Understanding (MOU) must first be in place between FinCEN and the external agency requesting access. User access is only granted to authorized individuals once approved by an Agency Coordinator from an external agency, which has a signed MOU in place, and by a FinCEN Liaison

Representative. Specific rights (i.e. access roles) to BSA data in FinCEN Query is determined through several entitlements, including: Justification Required, Domestic Network Required, International Network Required, Download Limit Per Transaction. Lastly, FinCEN Query end users must provide a justification in for each query that is run in the system.

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

Access to data is protected through user identification, passwords, database permissions and software controls. Such security measures establish different access levels for different types of users. Access to records in the system is limited to authorized personnel whose official duties require such access, i.e., on a “need to know” basis. This “need to know” access is enforced through roles and entitlements assigned to each user.

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

Misuse of information in FinCEN Query itself is controlled primarily through user profile management. A very small group of FinCEN employees has access to the information in FinCEN Query.

Misuse and unauthorized browsing of BSA data through FinCEN Query is controlled by a number of mechanisms. FinCEN Query is only accessible to end users via the FinCEN Portal. All users must be authorized to access FinCEN Query and assign a specific role based on “need to know” and their business justification for BSA data access. Access requests for external users must be authorized by an Agency Coordinator and a FinCEN Liaison Representative. All new requests for internal access, including access modifications and access removals, follow FinCEN access management policy and procedures and must be authorized by designated FinCEN management.

Additionally, specific BSA records in the System of Records have been flagged as suppressed and cannot be access through FinCEN Query by specific FinCEN Portal Profiles. Only the system administrators of the System of Records for BSA data have the ability to suppress and unsuppressed records. Suppressed records can either be categorized as “Limited” or “Restricted Access”. Limited Access records are records that are hidden from the users due to a temporary business need. Restricted Access records are not legitimate BSA data have made their way into the BSA data environment (i.e. a request from Federal law enforcement agency to suppress a filing for an undercover law enforcement agency). Access rights to these suppressed records, which are enforced through FinCEN Portal Profiles, is divided into three (3) categorizes:

- Unrestricted access to suppressed records allows the ability to see all suppressed records.
- Partially restricted access to suppressed records allows the ability to see that a record exists, but does not allow the end user to see the detail of the suppressed record. To see the detail, the end user would need to contact FinCEN outside of FinCEN Query and request access/provide justification to view the detail of the suppressed record.
- Restricted access prevents end users from seeing that a suppressed record exists.

All connections to BSA data, included connections between upstream and downstream applications, and connections to system and database administration sessions are encrypted using FIPS 140-2 compliance cryptographic mechanisms. All employees, including contractors, have requirements for protecting PII information in accordance with the Privacy Act of 1974

- 5) **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system?** If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Yes Partial No N/A Enclosed Reference

Details*

Contractors are involved in the design, development, and operations/maintenance of FinCEN Query. All contractors having system access are required to have appropriate security clearances. Their contracts include non-disclosure agreements and agreements to comply with all applicable FinCEN policies and laws, including the Privacy Act.

Internal system and database administrators will have *direct* access to BSA data the system for administrative purposes. All system and database administrators must be vetted by personnel security prior to gaining access. All system and database administrator access is granted based on the concepts of least privilege and separation of duties. All sensitive activities of system and database administrators, including access to BSA data, is recorded in audit logs.

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

Yes Partial No N/A Enclosed Reference

Details*

Through several staging environments, FinCEN Query indirectly accesses BSA data contained within the downstream BSA ITMOD information system the DCSD SOR. The data in the DCSD SOR is continuously collected from the BSA E-Filing system and from third-party data sources, then loaded into the DCSD SOR.

Additionally, FinCEN Query stores all end user query parameters in an auditing database. Query parameters contain PII information that has been used as search criteria. This database is available to other FinCEN information system for query analysis.

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

The information owner and system manager (identified in the Privacy Act System Notice) share overall responsibility for protecting the privacy rights of individuals by developing guidelines and standards which must be followed. The external agency users will also be responsible for protecting the information that they submit via the BSA E-Filing major application.

8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other (e.g., Tribal))?

FinCEN Query is accessible by authorized and authenticated Federal, state, and local law enforcement agencies; Federal, state, and local regulatory enforcement and examination organizations; United States Attorney's Offices for investigative and analytical purposes; and Federal agencies conducting background investigations on employees and contractors.

9) How will the data be used by the other agencies?

Data will be used by other agencies for analytical and investigative purposes based on the MOU established with FinCEN.

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

A formal user provisioning process has been established to authorize individual access to the FinCEN Query system. Coordinators from each external agency, as well as the respective FinCEN Liaisons, are responsible for authorizing access to the FinCEN Query system, and thus to BSA data. FinCEN personnel review actual use of FinCEN Query by users, looking for instances or patterns of use that appear inconsistent with user profiles, lacking in apparent justification, or otherwise suspicious. They then investigate such instances or patterns of use to determine whether data was used properly. They also investigate uses of data that was subsequently involved in unauthorized data disclosures, to determine whether data disclosed in an unauthorized manner had been obtained through FinCEN Query, and if so to discipline the users making such improper use of data.

Approval Page

The following Officials have approved this document –

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Information System Security Officer, FinCEN

Date

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Gregory Sohn
Chief Information Security Officer, FinCEN

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Date