

# Privacy Impact Assessment moveLINQ-USDA

Policy, E-Government and Fair Information Practices

- Version: 2.0
- Date: July 8, 2020





# Privacy Impact Assessment for the moveLINQ-USDA

July 8, 2020

## **Contact Point**

Joe Giorlando  
Financial Services Division, Director  
Associate Chief Financial Officer for Shared Services - Financial Management Services  
504-426-5639

## **Reviewing Official**

Stanley McMichael  
System Owner  
Associate Chief Financial Officer for Shared Services  
United States Department of Agriculture  
202-720-0564



## DOCUMENT ADMINISTRATION

### Document Revision and History

Revision	Date	Author and Title	Office	Comments
1.0	3 March 2017	S. Storms	ACFO-SS/FMS	Initial Draft
2.0	July 8, 2020	SSCD	OCFO/ACFO-SS/FMS/SSCD	Updates required

### DOCUMENT REVIEW

Reviewer	Title	Date	Update: Y/N	If systemic, please provide comments
Brian C. Dufour	SSCD ISSO	11/30/2018	N	No updates required
Brian C. Dufour	SSCD ISSO	July 8, 2020	Y	Update and new template required

## Abstract

The United States Department of Agriculture (USDA), Associate Chief Financial Officer Financial Management Services (ACFO-SS/FMS) is implementing moveLINQ-USDA to provide a standardized interagency travel system for use to relocate personnel within the Department. moveLINQ-USDA will automate cost calculations for travel authorizations, travel advances and other Transfer of Station (ToS) activities.

Utilizing 21<sup>st</sup> Century technologies while saving taxpayer dollars, moveLINQ-USDA is fully integrated with a SAP ERP solution providing Transfer of Station information as well as tax information for more efficient W-2 and travel transactions processing within the Department. moveLINQ-USDA automatically calculates pre-move cost for all relocation allowances including third party services to support accurate commitment and obligation of funding. moveLINQ-USDA electronically audits and enforces policy for processing all employee vouchers and associated third party invoices. moveLINQ-USDA tracks the issuance of advances and applies them during the voucher liquidation and payment process.

## Overview

System Name: moveLINQ–USDA

USDA Component: Office of the Chief Financial Officer

Purpose: The USDA is a licensed customer of mLINQS Hosting Service (MHS). MHS is the Software-as-a-Service (SaaS) offering for mLINQS’ relocation management software application, moveLINQ, hosted on the Microsoft Azure Government cloud infrastructure. The web-based cloud application will be used by USDA to calculate, process, manage and report on all department financial transactions (i.e., authorizations, obligations, vouchers, payments and taxes) associated with the relocation of a department employee. These transactions include the expense management processing for the transferring employee and the third-party vendors that provide associated relocation services (i.e., household goods shipment and storage, home sale services, etc.). The application provides assurance of compliance with agency and federal regulations, automated and accurate calculations, document workflow management, detailed cost tracking and comprehensive relocation cost reporting.

## Section 1.0 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 as part of the program, system, rule, or technology being developed.

### 1.1 What information is collected, used, disseminated, or maintained in the system?

moveLINQ-USDA stores comprehensive transfer of Station data (employee personal information, dependent names and birthdates, employee and spouse, if applicable, income, relocation costs, taxes, third party vendor names and identification numbers, etc.) and segregates it by organization and financial classifications.

**1.2 What are the sources of the information in the system?**

Relocation counselors enter relocation related information in to moveLINQ-USDA. This information is provided by the USDA employee that is relocating. The relocation information is processed, calculated, and subsequently sent to FMMI for funding of the relocation.

**1.3 Why is the information being collected, used, disseminated, or maintained?**

The information is being collected to calculate, process, manage and report on all department financial transactions (i.e., authorizations, obligations, vouchers, payments and taxes) associated with the relocation of a department employee

**1.4 How is the information collected?**

Agency relocation counselors and transportation specialist have each employee that is relocating complete a questionnaire. The information requested on the questionnaire is then used to create a relocation in moveLINQ-USDA. This information is necessary to process the relocation as well as ensure employees are not over/under paying their taxes for entitlement they have received.

**1.5 How will the information be checked for accuracy?**

moveLINQ-USDA has built in soft, medium and hard audits in which the system will flag any policy issues that may arise from the provided and entered information. The soft audits are available to make the user aware of an entry. Medium audits require the user to validate the entered data is correct. Hard audits must be corrected in order to continue with the relocation processes within moveLINQ-USDA.

**1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

USDA and moveLINQ-USDA have a Memorandum of Understanding (MOU) as to what needs to be collected and entered into the moveLINQ-USDA system in order to process a relocation

**1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

Collected information is related transferring an employee from their current duty location to a new location. Each relocation will require sensitive information on the employee and their family, if applicable in order to determine the correct entitlements and benefits they should receive while completing the transfer. Additionally, shorthand codes are entered into moveLINQ-USDA to transfer to FMFI so the relocation is obligated and funded.

These risks of disclosing some of the sensitive information is being mitigated by applying the following controls:

- All client/server communications are encrypted while at rest and during transport between moveLINQ-USDA and FMFI.
- USDA eAuthentication provides for controlled access for unauthorized users, allowing access to authorized users only.
- moveLINQ-USDA sessions are cancelled by the application server after 15 minutes of non-use.
- moveLINQ-USDA has a robust audit log capability. moveLINQ-USDA captures and retains all logon and logoff actions, changes to user profiles, and all changes within a relocation, authorization, amendment, and or voucher.

## **Section 2.0 Uses of the Information**

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

**2.1 Describe all the uses of information.**

USDA information within moveLINQ-USDA will be used to create and process a Transfer of Station, obligate money to fund the ToS, and capture statistical data to report to GSA.

**2.2 What types of tools are used to analyze data and what type of data may be produced?**

moveLINQ-USDA users may employ both highly customized and general purpose reports to analyze data:

- moveLINQ-USDA present users with budgetary information for each relocation within an agency.

- moveLINQ-USDA has a Reporting Portal (only authorized users can access) to produce a variety of summary and detail level reports regarding a ToS. Reports may be scheduled for regular generation and delivery via email, or may be requested for on-demand publication. Users also have the capability for Ad Hoc reporting within the moveLINQ-USDA Reporting Portal
- moveLINQ-USDA Reporting Portal has an Online Analytical Processing (OLAP) capability to provide users with a means of identifying trends and high level characteristics related to a ToS.

**2.3 If the system uses commercial or publicly available data please explain why and how it is used.**

moveLINQ-USDA uses GSA publicized rates to calculate costs associated with a ToS

**2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.**

USDA maintains NIST and USDA prescribed interconnection system agreements (ISAs) to protect information being transferred into or out of the moveLINQ-USDA system. Access controls including role-based account management and implementation of separation of duties and least privilege is enforced in the moveLINQ-USDA system through the use of roles and profiles. USDA has pre-defined roles that limit access to stored data. Each moveLINQ-USDA user is assigned a role that limits their access.

## **Section 3.0 Retention**

The following questions are intended to outline how long information will be retained after the initial collection.

**3.1 How long is information retained?**

Information is retained in compliance with National Archives and Records Administration (NARA) retention guidelines for financial management data:

GRS 1.1 Financial Management and Reporting Records; Item 080

GRS 2.4 Employee Compensation and Benefits Records; Item 090

GRS 1.1 Financial Management and Reporting Records; Item 010/011

**3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?**

The retention period has been approved by the component records officer and NARA

<https://www.ocio.usda.gov/policy-directives-records-forms/records-management/staff-office-file-plan>

**3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.**

Longer period of data retention can impose the risk of data being stolen, loss of data integrity, and confidentiality. ACFO-SS/FMS has implemented security controls to protect data. Information is protected by access rules. Users who need access to the data must be granted access by an authorized individual and will apply the appropriate access rules to their eAuthentication ID. Users are required to undergo training and sign a document of understanding.

## **Section 4.0 Internal Sharing and Disclosure**

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

**4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?**

moveLINQ-USDA will share relocation data with FMFI via secure transport method. After agency relocation counselors and transportation specialists have entered the required information to create the relocation and subsequent supporting documents, the information will be sent to FMFI. After transmission, the information will be processed

**4.2 How is the information transmitted or disclosed?**

Authorized USDA agency users access moveLINQ-USDA in the same way as ACFO-SS/FMS internal users. Limitations are applied through the assignment of restrictive roles.

**4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

Collected information is related transferring an employee from their current duty location to a new location. Each relocation will require sensitive information on the employee and their family, if applicable in order to determine the correct entitlements and benefits they should receive while completing the transfer. Additionally, shorthand codes are entered into moveLINQ-USDA to transfer to FMFI so the relocation is obligated and funded.



These risks of disclosing some of the sensitive information is being mitigated by applying the following controls:

- All client/server communications are encrypted through while at rest and during transport between moveLINQ-USDA and FMFI.
- USDA eAuthentication provides for controlled access for unauthorized users, allowing access to authorized users only.
- moveLINQ-USDA sessions are cancelled by the application server after 15 minutes of non-use.
- moveLINQ-USDA has a robust audit log capability. moveLINQ-USDA captures and retains all logon and logoff actions, changes to user profiles, and all changes within a relocation, authorization, amendment, and or voucher.

## Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

### **5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

Not applicable. No data is shared externally to USDA.

### **5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

Not applicable. No data is shared externally to USDA.

### **5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

Not applicable. No data is shared externally to USDA.

### **5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

Not applicable. No data is shared externally to USDA.

## Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

**6.1 Does this system require a SORN and if so, please provide SORN name and URL.**

*OCFO-10*

<https://www.federalregister.gov/documents/2018/12/31/2018-28375/privacy-act-of-1974-system-of-records>

**6.2 Was notice provided to the individual prior to collection of information?**

The relocating employee provides the information entered into moveLINQ-USDA by a relocation counselor.

**6.3 Do individuals have the opportunity and/or right to decline to provide information?**

If the individual does not consent to the use of the information, the Transfer of Station will have to be cancelled. This information is necessary to correctly determine entitlements and benefits due the employee for relocating from their old to their new duty station.

**6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

If the individual does not consent to the use of the information, the Transfer of Station will have to be cancelled. This information is necessary to correctly determine entitlements and benefits due the employee for relocating from their old to their new duty station.

**6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

Notice is provided to the employees by ACFO-SS/FMS when the individuals are going through the relocation cost reimbursement process. There are no risks of the individuals being unaware of the collection.

## Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

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

Relocation counselors will inform the individual of their status throughout the relocation. In future use, USDA will allow individuals to log into an employee portal page in which they will see their status throughout the process.

### **7.2 What are the procedures for correcting inaccurate or erroneous information?**

The relocation counselor/transportation specialist will make corrections.

### **7.3 How are individuals notified of the procedures for correcting their information?**

Individuals are notified by their relocation counselors on the proper procedures of correcting their information.

### **7.4 If no formal redress is provided, what alternatives are available to the individual?**

Individuals will always seek correction through their relocation service center or directly with their relocation counselor/transportation specialist.

### **7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

Relocation counselors/transportation specialist do not discuss sensitive information regarding a relocating employees' personal information except on a need to know basis.

## Section 8.0 Technical Access and Security

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

### **8.1 What procedures are in place to determine which users may access the system and are they documented?**

Users have access to the information in the system based on job function and the need to know the information. Security profiles are set up for users to ensure that internal controls and separation of duties are maintained. Sensitive information is restricted from users if there is no valid job-related need for the information to perform the duties of their position. The user must login via eAuthentication (eAuth) in which their actions within the system are recorded and placed in a log. Access via eAuth requires permissions and set-up through the USDA agency and security team.

### **8.2 Will Department contractors have access to the system?**

USDA will have a limited number of contractors with access to the moveLINQ-USDA test environment. Contractors will not have access to the production environment.

### **8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

All USDA employees and contractors are required to complete privacy training. Training includes basic security briefings about awareness training and annual refresher training, rules of behavior, and non-disclosure agreements.

### **8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

Security Assessment and Accreditation for moveLINQ-USDA and a Authority to Operate was granted in 2017 and annual assessments are conducted. Re-Authorization to Operate will occur in FY2020.

### **8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

An audit log is maintained in moveLINQ-USDA to effectively trace actions within the system to the responsible individual. The log is protected from unauthorized modification, destruction, and access by the limiting access rights to audit logs. The audit logs will be reviewed weekly by the moveLINQ-USDA Security Administrator for instances of misuse or abuse.

**8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

These risks of disclosing some of the sensitive information is being mitigated by applying the following controls:

- All client/server communications are encrypted through while at rest and during transport between moveLINQ-USDA and FMML.
- USDA eAuthentication provides for controlled access for unauthorized users, allowing access to authorized users only.
- moveLINQ-USDA sessions are cancelled by the application server after 15 minutes of non-use.
- moveLINQ-USDA has a robust audit log capability. moveLINQ-USDA captures and retains all logon and logoff actions, changes to user profiles, and all changes

## **Section 9.0 Technology**

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

**9.1 What type of project is the program or system?**

The Department implementation of moveLINQ-USDA is a major mission supportive application. moveLINQ-USDA is a web-based database management system that integrates fiscal activity with Transfer of Station information for USDA agencies. This data is reconciled with one another in FMML. Unreconciled data will be identified and assigned to a USDA technician for research and resolution.

**9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.**

moveLINQ-USDA does not employ any technology of concern (e.g., collaborative computing devices, file sharing, etc.).

## **Section 10.0 Third Party Websites/Applications**

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

**10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?**

The System Owner and the ISSPM have reviewed and understand OMB memorandums M-10-22 and M-10-23.

**10.2 What is the specific purpose of the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

moveLINQ-USDA does not utilize third-party websites. However, data is received from manual inputs from third party entities in support of relocating a USDA employee.

**10.3 What personally identifiable information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications.**

Not applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.

**10.4 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be used?**

Not applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.

**10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

Not applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.

**10.6 Is the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

Not applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.

**10.7 Who will have access to PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

Not applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.

**10.8 With whom will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

Not applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.

**10.9 Will the activities involving the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

Not applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.

**10.10 Does the system use web measurement and customization technology?**

Not applicable. moveLINQ-USDA does not use web measurement and customization technology.

**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

Not applicable. moveLINQ-USDA does not use web measurement and customization technology.

**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

Not Applicable. moveLINQ-USDA does not share sensitive information with third party websites or applications.



## Responsible Officials

---

Eddie Reso  
Acting Director, Financial Services Division  
Associate Chief Financial Officer – Shared Services  
Financial Management Services  
United States Department of Agriculture

---

Date

---

Kenny McDuffie, Information System Security Manager  
Associate Chief Financial Officer-Shared Services  
Financial Management Services  
United States Department of Agriculture

---

Date

## Approval Signature

---

Lance Raymond, PhD  
System Owner  
Associate Chief Financial Officer – Shared Services  
Director, Financial Management Services  
United States Department of Agriculture

---

Date