



U.S. Department of the Interior

PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the [DOI PIA Guide](#) for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

Name of Project: SEI, Trust Funds Accounting System (TFAS) Decommissioning

Bureau/Office: Bureau of Trust Funds Administration (BTFA), Trust Services

Date: September 30, 2022

Point of Contact

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Section 1. General System Information

A. Is a full PIA required?

- Yes, information is collected from or maintained on
 - Members of the general public
 - Federal personnel and/or Federal contractors
 - Volunteers
 - All

No: *Information is NOT collected, maintained, or used that is identifiable to the individual in this system. Only sections 1 and 5 of this form are required to be completed.*

B. What is the purpose of the system?

The Bureau of Trust Funds Administration (BTFA), formerly the Office of the Special Trustee for American Indians (OST), managed the Trust Funds Accounting System (TFAS), which was the SEI Investments Inc. (SEI) Trust 3000 commercial-off-the-shelf Trust accounting system.



SEI, TFAS assisted OST in meeting the fiduciary responsibilities set forth in the American Indian Trust Fund Management Reform Act of 1994 including management of the receipt, investment, disbursement and administration of money held in trust for individual Indians and Alaskan Natives (or their heirs), and Indian Tribes, and ensured timely, accurate, and consistent responses to beneficiary inquiries. The system also assisted the OST in providing litigation support by analyzing and reconciling the historical collection, distribution, and disbursement of income from Individual Indian Money (IIM) accounts, Indian trust land, and other revenue sources.

The SEI Trust Funds Accounting System (TFAS) has been decommissioned. All data in the SEI TFAS was securely migrated to the new Innovest InnoTrust TFAS. SEI and its affiliates verified that all BTFA data related to the TFAS BTFA contract on SEI's servers were deleted. SEI retained certain BTFA data, documents, and other records in order to comply with its legal, regulatory, and archival policy obligations. SEI maintains the confidentiality of such retained BTFA data, documents, and other records in accordance with SEI policies and procedures. Those records have been deleted in accordance with SEI's established retention policy.

On September 30, 2019, BTFA converted from SEI Trust 3000 to Innovest InnoTrust TFAS. SEI TFAS no longer maintains historical data and BTFA maintains a copy of the historical data that BTFA houses on its own database servers. SEI has verified that all data on SEI servers were deleted and the documentation is uploaded into the Cyber Security and Asset Management (CSAM) system, located in the appendices. BTFA prepared documentation officially notifying the DOI Chief Information Security Officer of the SEI TFAS System Security Authorization and Boundary Decommission Certification completion. The decommission documentation verified that BTFA terminated its use of the contractor, and SEI operated TFAS has transitioned (migrated) to the Innovest InnoTrust system. The following system decommissioning actions were completed:

- Sanitization of the SEI TFAS assets
- Closure of any SEI TFAS Plans of Actions and Milestones (POA&Ms)
- Updated the CSAM system record
- Archival documentation was completed in accordance with the SEI TFAS Files Maintenance and Disposition Plan

There was a limited privacy risk for the decommissioning of the SEI, TFAS related to potential unauthorized access or mishandling of the residual data that remained in the legacy SEI, TFAS; that risk was mitigated since the SEI TFAS no longer maintained the historical data and was deleted (destroyed) in accordance with the approved records retention and disposition schedule and policy. All TFAS data related to the TFAS SEI on SEI's servers have been deleted. Decommissioning of SEI TFAS was verified, completed, and has been removed from the DOI system inventory. Applicable software Archive, hardware Disposition, and related Documentation and Data Archive was migrated into the BTFA InnoTrust TFAS as the receiving system(s). BTFA conducted a Privacy Impact Assessment (PIA) to evaluate the privacy risks for use of the Innovest TFAS, which is available at: <https://www.doi.gov/privacy/pia>.



C. What is the legal authority?

The American Indian Trust Fund Management Reform Act of 1994 (P.L. 103-412), 108 Stat. 4239; 25 U.S.C. 42, American Indian Trust Fund Management Reform; 25 U.S.C. 116, 117(a)(b)(c), 118, 119, 120, 121, 151, 159, 161(a), 162(a), 4011, 4043(b)(2)(B).

D. Why is this PIA being completed or modified?

- New Information System
- New Electronic Collection
- Existing Information System under Periodic Review
- Merging of Systems
- Significantly Modified Information System
- Conversion from Paper to Electronic Records
- Retiring or Decommissioning a System – SEI TFAS has been decommissioned
- Other: *Describe*

E. Is this information system registered in CSAM?

- Yes: *Enter the UII Code and the System Security Plan (SSP) Name*

010-000000934, TFAS System Security and Privacy Plan.

- No

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

Subsystem Name	Purpose	Contains PII (Yes/No)	Describe If Yes, provide a description.
None	N/A	No	N/A

G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?

- Yes: *List Privacy Act SORN Identifier(s)*

INTERIOR/OS-02, Individual Indian Money (IIM) Trust Funds, 84 FR 44321 (August 23, 2019), which may be viewed at: <https://www.doi.gov/privacy/os-notices>.

- No



H. Does this information system or electronic collection require an OMB Control Number?

Yes: *Describe*

OMB Control Number 1035-0004, Individual Indian Money (IIM) Instructions for Disbursement of Funds and Change of Address; Expiration date: 01/31/2024

No