Enterprise Loan Management System (ELMS)

PRIVACY IMPACT ASSESSMENT (PIA) SUMMARY

System Name: Enterprise Loan Management System (ELMS)

Managing Office: EE/PO/FS

Date PIA Completed: March 12, 2012

OVERVIEW

ELMS is a proprietary system developed and owned by Midland Loan Services, a division of PNC Bank, National Association (Midland) for the management of commercial loan portfolios on a third party basis. ELMS is an integrated system that combines loan accounting, servicing, asset management, borrower information, and activity reporting for the life of a loan. As the book of record for USAID's entire loan portfolio, ELMS contains historical data and current activity data as well as loan activity comments and integrated document imaging to provide electronic availability of all correspondence related to every loan. ELMS system has no interdependencies with other systems, however data and reports from ELMS are delivered to USAID as inputs to various USAID hosted applications.

AUTHORITY FOR COLLECTION OF PERSONALLY IDENTIFIABLE INFORMATION (PII)

Not applicable as PII is not collected.

INFORMATION COLLECTION (WHAT)

PII, for Privacy Act of 1974 purposes, is not collected through ELMS as the USAID loans and guaranties tracked through ELMS are made to sovereign nations or to financial institutions. The only information about an individual used within ELMS is the name of an officer or official at the ministry of finance relating to the tracked loan or guaranty. Information relating to such an individual is limited to name, and, in limited instances, office telephone and office email address.

INFORMATION COLLECTION (WHY)

The limited information about an individual collected and maintained by ELMS (generally furnished by various ministries of finance of sovereign nations) is to provide USAID with contact information of the officer at the related finance ministry or financial institution.

AGENCY INTENDED USE

Information about individuals who are officers at related finance ministries or financial institutions is used by USAID to communicate with these officers about the USAID loan or guaranty extended to their sovereign nation or financial institution. Loan transaction reports, which do not contain any personal information or PII, are provided to USAID by email.

INFORMATION SHARING

ELMS has no interdependencies with other systems. However, data and reports from ELMS are delivered to USAID as inputs to various USAID-hosted applications. Midland employees have access to ELMS, but ELMS data is not shared outside USAID. Loan and guarantee information in ELMS is accessible via view-only access through Midland's portfolio access and borrower access web portals.

NOTICE OF OPPORTUNITIES FOR CONSENT

Individuals are not asked to provide PII for the ELMS database. The name and contact information for an officer related to a loan or guaranty is not required by USAID but providing that information is within the latitude granted by USAID to the foreign finance ministries.

INFORMATION SECURITY

ELMS does not contain PII. However, access to ELMS is limited to Midland employees, who access ELMS via the Midland's intranet. The ELMS system administrator establishes new user access according to manager instructions regarding level of access required by a user. Access is controlled by standard identification and password protocols.

ELMS data on USAID loans and guaranties is held by Midland in a separate database. ELMS usage and processes related to activities are reviewed regularly in accordance with Standards for Attestation Engagements No. 16 of the American Institute of Certified Public Accountants control and review criteria.

SYSTEM OF RECORDS NOTICE (SORN)

Not applicable. ELMS does not retrieve records containing an individual's contact information by name or other unique personal identifier.