



Privacy Threshold Analysis:

**CreditLens**

## Introduction

This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this application. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the DFC security/privacy policy. Please answer all questions as completely as possible. Responses should be brief but have enough detail for the privacy office to determine if Personally Identifiable Information (PII) exists in the application. Use the <Tab> key to move between fields. When finished, save the document and send it to the privacy office at [privacy@DFC.gov](mailto:privacy@DFC.gov).

## General Information

**Name of IT Application:** *CreditLens*.

**Name of Submitter:** *Abhishek Shah*

**Name of Program Office:** *Office of the Chief Information Officer (OCIO)*.

**Name of IT System Owner:** *Erick DeCarli*

**Email for IT Application Owner:** *Karen.Segerstrom@dfc.gov*

**Date submitted for review:** *11/25/2020*

## Description of the IT Application

Provide a general, non-technical description of the application and its purpose so that its function and purpose are clear.

DFC is implementing a Moody's software called CreditLens to streamline/automate DFC's credit risk management processes by automating DFC's existing Probability of Default (PD) and Loss Given Default (LGD) scoring models and their associated workflows, approvals and supporting business processes. This project will implement the framework's system integration with DFC's business processes and data as well as other DFC solutions, such as Insight/Salesforce, EBS/LNS (Oracle) and any historical data. This project will determine and implement, as approved, changes to the interfaces to and from Salesforce Insight and from Oracle EBS that need to be designed, and any other application configuration changes and business process changes necessary to facilitate a more efficient process.

## Questionnaire

### 1. Status of IT application:

This is a new IT application.

*Date IT application entered development:* *08/22/2019*

This IT application has an existing PIA and as part of A&A review, we certify that there are no changes.

This is an existing IT application without a current PTA.

This is an existing IT application that has been updated.

*Date updated:* *MM/DD/YYYY*.

Please provide a general description of the update and what specifically has changed related to the application's handling or collection of PII:

[Click here to enter text.](#)

**2. Provide a general, non-technical description of the application and its purpose so that its function and purpose are clear:**

CreditLens will replace existing MS Excel templates used for credit rating. It will streamline and automate DFC's credit risk management processes. In addition to that, CreditLens will be integrated with Insight or Salesforce to manage data flow between two platforms.

**3. Indicate the stage of the IT application development life cycle the IT application is in.**

- Planning
- Development
- Production

**4. Do you collect, process, or retain information on (please check all that apply):**

- a. DFC employees?  Yes  No
- b. Contractors working on behalf of DFC?  Yes  No
- c. The public?  Yes  No

**5. Do you use or collect ANY of the following:**

- a. Social Security Number?  Yes  No
- b. Driver's License or State ID?  Yes  No
- c. Passport Number?  Yes  No
- d. Alien Registration Number?  Yes  No
- e. Personal Financial Account Number?  Yes  No
- f. Biometric Identifiers?  Yes  No

If you answered YES to any of the above, why does the application collect the information? Provide the function and the legal authority to do so.

[Click here to enter text.](#)

**6. Is the following information collected about individuals:**

- a. Full name?  Yes  No
- b. Email?  Yes  No
- c. Home address?  Yes  No
- d. Personal phone number?  Yes  No

**6.1 If you answered YES to any option in question 6, please indicate whether the application also collects ANY of the following information about individuals:**

- a. Date of birth  Yes  No
- b. Mother's maiden name  Yes  No
- c. Medical Information  Yes  No
- d. Account passwords  Yes  No
- e. Citizenship or immigration status  Yes  No

- f. Ethnic or religious affiliation  Yes  No
- g. Criminal history  Yes  No
- h. Last 4 digits of SSN  Yes  No

If you answered YES to any of the information types in Question 6.1, why is this information collected?

[Click here to enter text.](#)

**7. What additional information (not already disclosed above) about individuals is collected, generated, or retained? Please be specific, to include data elements.**

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**8. Does the IT application collect, receive, or share personally identifiable information (PII)<sup>1</sup> or sensitive PII (SPII)<sup>2</sup> with any other IT applications?**

- No.
- Yes. If so, please list any other IT applications that share this type of information with your IT application.

[N/A](#)

**9. Is the application able to retrieve information about individual by name or by some identifying number, symbol, etc.?**

- No.
- Yes.

**10. Do users of the application retrieve information about individual by name or by some identifying number, symbol, etc.?**

- No.
- Yes.

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<sup>1</sup> Information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a US Citizen, legal permanent resident, employee or contractor to DFC. PII is data present in question 6 only.

<sup>2</sup> SPII is PII, which, if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. SPII is any data present in question 5 or data of question 6 combined with any data in question 6.1.

# Privacy Threshold Review

*(To be completed by the DFC Privacy Team)*

## Review

**1. Is there an Assessment and Authorization (A&A) for this application?**

- Unknown.
- No.
- Yes. Please indicate FIPS 199 Categorization for each of the following:
  - Confidentiality:  Low  Moderate  High  Undefined
  - Integrity:  Low  Moderate  High  Undefined
  - Availability:  Low  Moderate  High  Undefined

**2. Which FISMA system will this application belong to?**

- DFCNet
- Insight
- EBS
- Other

**3. Will this application be a system of record and require a notice?**

- Yes
- No

## DFC Privacy Program Manager Review Comments

*CreditLens replaces a manual process. The application/capability directly supports the Insight application therefore it is recommend the services be include in its boundary.*

*If no PIA is required, then this document will serve as the Privacy Impact Assessment*

# Privacy Threshold Review

*(To be completed by the DFC Privacy Team)*

**Date reviewed by the DFC Privacy Program Manager:** *12/01/2020*

**Name of Reviewer:** *Brian Gay – on behalf of DFC CISO*

## Designation

**This is NOT a privacy sensitive IT application.** The IT application contains no sensitive personally identifiable information and no PIA is required.

PTA is sufficient at this time

**This IS a privacy sensitive IT application.** The application contains sensitive PII. *NOTE: IF the user answered YES to ANY option in question 5 OR IF user answered YES to ONE or MORE options in question 6.1 this box must be checked.*

PIA is required

**X** \_\_\_\_\_  
SAOP or *Designated Rep*

Date \_\_\_\_\_