

Privacy Impact Assessment Template

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the FGISonline

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Abstract

The system name is USDA AMS FGISonline. It is a portfolio of web-based business applications that AMS' Federal Grain Inspection Service (FGIS) uses for business operations and to better serve the customers of USDA's official grain inspection and weighing service. This PIA is updating the original PIA based on an updated template and a new Certification and Accreditation (C&A).

Overview

FGISonline is managed by the Federal Grain Inspection Service (FGIS)-a program within the Department of Agriculture's (USDA) Agricultural Marketing Service (AMS). FGISonline is a suite of business applications that provides grain inspection and weighing business operations and information electronically via a computer. These online services have improved the efficiency and effectiveness of service delivery by streamlining business practices, improving customer service, and meeting Federal eGovernment and related USDA requirements.

FGISonline collects results of the inspection, testing, and weighing of grain and commodities under the USGSA and AMA. It also collects information about the equipment, locations, and people that are used to conduct these services.

A typical transaction would include the collection of information about quality results of a shipment of grain for export.

The authority for the maintenance of FGISonline is 7 U.S.C. 77, 79, 79a, 79b, 84, 87f-1; and 7 1622.

FGISonline is comprised of a portfolio of program modules designed to aid in delivery of the AMS and FGIS mission. Each module delivers usable capabilities that provide value to customers. This modular development provides AMS increased flexibility to adopt emerging technologies incrementally, reducing the risk of technological obsolescence of the FGISonline investment portfolio. Several of the modules are administrative and are used by FGIS to deliver data to user interface service modules.

The FGISonline portfolio has two environments in which it resides. A development environment hosted locally on servers at the USDA South Building, and the production environment hosted at the National Information Technology Center (NITC).

A distributed architecture is required to meet the inspection and certification needs in many elevator locations. Thus for these systems both a distributed and online version is available to provide service in areas where connectivity can be limited or a need for continuous connectivity places undue risk on meeting service needs.

The data interchanges between the various components are managed through a series of Web services specifically designed to support the business process or as needed, through Windows Services that reside on the local server or local workstation.

The FGISonline system resides in a controlled, limited-access building located at the National Information Technology Center (NITC) in KC.



Privacy Impact Assessment – Guidance and Template

The servers house the applications listed in the System Description. The system is accessible from the Internet. All system functions require Level 2 Authentication which is provided by the USDA eAuthentication system.

Administrative modules include:

- **GAM Authorization System (GAS)** A security system that controls user access to FGISonline. It works with the USDA's eAuthentication system to assign access rights to users. Application administrators manage access to applications and types of access to those applications.
- **Code Variable Maintenance (CVM)** Maintains the code variables that are used across the applications so they all use the same names, definitions, and properties.
- **Distributed Application Software Host (DASH)** This application manages the information generated by the distributed architecture software such as registered Machine ID's and distributed software inventory.
- **Distributed Enterprise Application Manager (DEAM)** This application provides a distribution platform for the distributed architecture software.
- **Data Transmission System (DTS)** This application provides a distributed platform for the distributed architecture software and manages the information generated by the distributed architecture software such as registered Machine ID's and distributed software inventory.

User interface service modules include:

- **Home Pages (HPS)** This application serves as a portal to provide users with links to every application in the FGISonline portfolio. AMS's organizational structure, personnel, and service locations.
- **Inspection, Testing, and Weighing (ITW & DITW)** This applications allows users to enter inspection, testing and weighing results for grain and automates the calculations for the CuSum loading plan and grade determination. *There is also a distributed version of this called DITW that has to be downloaded on a computer for use.*
- **Certificates (CRT & DCRT)** FGIS official service providers enter inspection and weighing results, and produce electronic or paper official inspection and weighing certificates. This program feeds data into our Inspection Data Warehouse. *There is also a distributed version of this called DCRT that has to be downloaded on a computer for use.*
- **Class Y Weight Certificates (CRT_Y)** Manages certificate generation from Class Y weighing that is performed by elevator personnel who do the weighing and issue "yellow" certificates.
- **Inspection Data Warehouse (IDW)** Our customers can visit this national database to see individual service records or arrange for daily data transmissions of inspection and weighing records. The database contains the inspection and weighing records for services officially performed under the U.S. Grain Standards Act and the Agricultural Marketing Act of 1946.
- **GIPSA Billing Application (GBA)** Records billing documents and accounting information to calculate invoice amounts and interfaces with the Financial



Management Modernization Initiative (FMMI).

- **Equipment Capability Testing (ECT)** Records information on equipment used for the testing of grain quality, to validate the equipment's capability to accurately test grain quality.
- **FGIS Official Service Provider Licensing (FOL)** Provides study materials, examinations, and score sheets for official service providers to use for administering licensing exams for personnel who perform official functions under the U.S. Grain Standards Act and the Agricultural Marketing Act of 1946.
- **Automatic Weighing Events (AWE)** The viewer that allows for the viewing of the event logs generated by the elevators on the Automated Weighing System (AWS).
- **Quality Assurance and Control (QAC)** This application allows users to enter data, access results, and track inspector performance and ability under the authority of AMS.
- **Customer Information Management (CIM)** Customers set up an account and manage their information in FGISonline. Customers request a customer number; set up access for their company's primary and secondary users; and request access to their information. Customers can use this application to manage access to the national Inspection Data Warehouse.
- **Delegations/Designations and Export Registrations (DDR)** State and private entities can use this program to apply online to become official service providers. Grain firms can log on to register online with FGIS as grain exporters.
- **Agricultural Product Standards (APS)** Manages the hierarchy of products, commodities, classes, and subclasses for FGIS. It also provides information on the factors, grades, and grade limits for those products under FGIS authority.
- **Domestic & Export Counts (DEC)** This application allows users to enter data about export shipments and volume of inspections that have traditionally been captured on the paper forms FGIS-938 and FGIS-922.
- **Elevator Log Viewer** This distributed application provides a mechanism to obtain visibility of the inspection log at an export elevator location prior to completion. The application is installed on the elevator computer and data is pushed from the DITW machine on site to the viewer. The viewer is unable to request information, it can only accept information.
- **Service Request System (SWM)** Manages the request for services, fulfillment of services & the certification processes. It allows users to view and pay charges for services, view results and certificates, and manage access to users of their organization. It serves as both a Web Portal for centralized processing and a stand-alone application installed on workstations at service center sites.
- **Equipment Results Translator (ERT)** This application allows inspectors to capture & record the results provided by equipment used for the testing of grain quality. The results are automatically stored and then transferred to the SWM application using a web application interface for validation and acceptance.



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?

Official grain inspection and weighing information, as well as data related to standards, equipment, locations and performance of the official grain system. Information regarding individuals licensed under the USGSA; information regarding AMS' organizational structure, personnel, and service locations.

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

FGIS customers, FGIS personnel at service locations, and headquarters, official service providers that AMS designates to provide official inspection services under the USGSA, individuals employed by official service providers licensed under the USGSA and AMA, and registered exporters.

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

FGISonline manages inspection and weighing records for services performed under the USGSA and AMA and provides the public access to general information about grain quality, official service volume, and the inspection and weighing of grain in domestic and international commerce. FGISonline automates the licensing, registration, delegation/designation, and equipment testing processes; provides online testing for licensed personnel and enhances recordkeeping; and expands FGIS' quality assurance and control capabilities.

1.4 How is the information collected?

FGISonline captures all grain inspection, testing, and weighing information at the point of origin and stores and manages data and information collected and generated under the USGSA and AMA to deliver official services. FGIS also collects information from its customers, official service providers, and licensed inspection personnel. Information is collected via the web.



1.5 How will the information be checked for accuracy?

The system has a series of data validation rules. Users are responsible for checking data prior to submission. Some systems have manual review of information. FGIS conducts audits of the official service providers and FGIS offices where data accuracy is reviewed. Also, periodic manual reviews are conducted of the data by subject matter experts.

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

The authority for the maintenance of FGISonline is 7 U.S.C. 77, 79, 79a, 79b, 84, 87f-1, 1622; and the regulations thereunder.

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

Access to FGISonline is strictly controlled, with access granted through the USDA secure single sign-on application e-Authentication with level 2 validation and authorization within FGIS, AMS. FGISonline is role based. FGISonline users access the system using unique authorized accounts, and are assigned level-of-access roles based on their needs. The level of access for the user restricts the data that can be seen and the degree to which data may be modified by the user.

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.

FGISonline consists of business applications that are used by specific AMS groups and partners in the official inspection system (Official service providers) that work with particular business processes, such as certificates; equipment capability testing; the inspection data warehouse; licensing; inspection, testing, and weighing; and quality assurance and quality control. FGISonline also consists of online applications that are be used by AMS, as well as AMS' customers official service providers, to provide official services and to receive data.



Official service providers are able to submit information electronically for quality control activities, licensing, and user fee assessment. AMS checks on the performance of a piece of equipment over time using equipment check-testing data that will allow comparison with similar equipment. At export locations, inspectors who enter inspection results use edit checks that reduce errors; and data flows directly to AMS' certification, billing, and quality control applications. Customers now have immediate and direct access to their inspection results and can forward them to their customers or others to complete sales transactions or to clear customs.

AMS' databases interface with other government computer systems to improve the enforcement of AMS' statutory requirements.

FGISonline integrates all of FGIS' programs' business functions, thus allowing AMS to conduct its business more effectively. FGISonline also offers vastly improved access to AMS' products and information benefitting AMS and its official partners and customers.

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

The system uses queries and reports built into FGISonline.

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

No commercial or publicly available data is used

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.

N/A

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?

6 years 3 months



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

Yes

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

Data is kept for the appropriate amount of time as determined by the records retention period. Risk is low for loss of data since database is backed up.

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?

No PII is shared.

4.2 How is the information transmitted or disclosed?

N/A

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.

N/A

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?

No PII is shared.



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.

N/A

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

N/A

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

N/A

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.

No

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

Yes- This is a U.S. Federal Government information SYSTEM that is "FOR OFFICIAL USE ONLY". Unauthorized access is a violation of U.S. law and may result in criminal or administrative penalties. Users will not access other users' computers or system files without proper authorization. This system is intended for communication, transmission, processing and storage of U.S. Government information. Absence of access controls is NOT authorization for access! These systems and equipment are subject to monitoring by law enforcement and authorized officials. Monitoring may result in the acquisition, recording, and analysis of all data being communicated, transmitted, processed, or stored in this system by law enforcement and authorized officials. Use of this system constitutes consent to such monitoring. *** PRIVACY ACT NOTICE *** This system contains information protected under the provisions of the Privacy Act of 1974 (Public Law 93-579). Any privacy information displayed on the screen or printed from the system must be protected from unauthorized disclosure. Employees who violate privacy safeguards may be subject to disciplinary actions, a fine of up to \$5,000, or both. USDA AMS FGIS gathers information on employees, individuals applying for FGIS services, business partners, contractors and clients. The Privacy Act of 1974 established



Privacy Impact Assessment – Guidance and Template

controls over what personal information is collected by the federal government and how it is used. By accessing this system you consent to the collection and use of your information by USDA AMS FGIS. You may decline, but these services will not be available to you. The Act grants rights to United States citizens and legal permanent residents. Under the Privacy Act you: Have the right to see records about yourself; and Can correct a record that is inaccurate, irrelevant, untimely, or incomplete. The Act mandates that the Government: Informs you why information is being collected and how it is going to be used; Assures that information is accurate, relevant, complete and up-to-date before disclosing it to others; Allows you to find out about disclosures of your records to other agencies or persons; and Provides you with the opportunity to correct inaccuracies in your records. The Privacy Act applies only to records about individuals maintained by agencies in the executive branch of the government. It applies to these records only if they are kept in a "system of records." A "system of records" is a group of records from which the information was retrieved by an individual's name, social security number, date of birth or some other personal identifier.

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

Yes. Individuals have the opportunity and/or right to decline to provide information; however, they do so knowing that they may not partner, receive services, or provide services with AMS.



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

No, individuals do not have the right to consent to particular uses of the information. AMS uses the information to initiate the application process, to provide official inspection and weighing services; to ensure the accuracy of the official grain inspection system; to maintain statistical inspection data, and to enforce the USGSA and AMA.

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.

Information about the individual is submitted by the individual.

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?

Individuals have role-based access through e-Authentication and e-Authorization to their data.

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

Individuals have role-based access through e-Authentication and e-Authorization to their data. They are able to correct or update their data.

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

They have an edit choice for their data submissions.

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

N/A



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

N/A

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?

End users have access only to their own information and have write privileges to a very limited subset of this information.

System administrators, database administrators, and designated application representatives have customized access based on the requirements needed for completing their specific job functions.

In regards to access role management, the Agency application business owners designate internal access role administrators, and they are responsible for maintaining the access role membership.

When identity management views are assigned to a user, the view is limited to the least amount of data needed for completing the user's specific job functions. If Personally Identifiable Information is included in the view, the administrator receiving the view must adhere to security precautions as outlined in NIST, OMB, FIPS, GSA and Department regulations.

8.2 Will Department contractors have access to the system?

Access is based on need. If there is a need to access the system, they would go through the same procedures as other users.

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

All AMS employees are required to complete the Computer Security and Accessibility training annually. In addition, those that handle PII must also take annual training.



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

Yes

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

The system uses e-authentication and e-authorization for role based access to prevent unauthorized access. There is electronic validation of many of the data elements, and manual audits are conducted on a regular basis.

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?

It has been alleged that sensitive information regarding industry partners can be rationally concluded/extracted from the data included in the supplementary reports provided by FGISonline. This alleged risk was assessed by the initiation of working groups including collaborations with Program Management, IT, the Department, Security, the USDA Science and Agricultural Statistics Committee and the Privacy Office for the specification and enforcement of applicable Federal requirements regarding the identification and formal protection of industry Trade Secrets. These efforts continue.

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?

Web-based application.

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

No



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”?

Yes

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

If so, is it done automatically?

<< ADD Answer Here >>



If so, is it done on a recurring basis?

<< ADD Answer Here >>

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

N/A

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

N/A

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

N/A

10.10 Does the system use web measurement and customization technology?

No

If so, is the system and procedures reviewed annually to demonstrate compliance to OMB M-10-23?

<< ADD Answer Here >>

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?

N/A

If so, does the agency provide the public with alternatives for acquiring comparable information and services?

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

N/A



Agency Approval Signature

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