

Privacy Impact Assessment

RD Mainframe Hosted Applications

(RD MHA)

- Version: 1.0
- Date: July 17, 2023
- Prepared for: USDA Rural Development





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July 17, 2023

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Abstract

As part of a Rural Development (RD), Technology Office Cyber Security Division (CSD) Initiative to reduce the number of Assessment & Authorization (A&A) systems, CSD developed the “Boundary Consolidation Project.” The Project consolidated applications found in three (3) system boundaries (AMP (all), BI (FOCUS), CLP Support (LoanStat) into the RD Mainframe Hosted Applications boundary (RD MHA). The PTA found that PII was processed by AMP applications and FOCUS and thus required a PIA.

Overview

As part of a Rural Development (RD), Technology Office Cybersecurity Division (CSD) Initiative to reduce the number of Assessment & Authorization (A&A) systems, CSD developed the “Boundary Consolidation Project.” The Project consolidated applications and hardware (AMP) from three (3) system boundaries (AMP, BI, CLP Support) into the RD Mainframe Hosted Applications (RD MHA) authorization boundary.

Automated Mail Processing (AMP)

The purpose of **AMP** is to provide financial enterprise print and mail-handling services to RD, the Farm Production and Conservation (FPAC), National Resource Conservation Service (NRCS), Agricultural Marketing Service (AMS), Federal Grain Inspection Service (FGIS) and other on-demand Federal agencies. AMP produces and distributes financial and management reports, as well as loan servicing and customer notification correspondence for all program areas. AMP produces and distributes financial and management reports, as well as loan servicing and customer notification correspondence as outlined in the above paragraph. The volume of printed material exceeds 16 million pieces of mail per year and supports an average of 475,000 pieces of metered mail per month. AMP consists of three components: Mail Preparation, Printing, and Mail Insertion.

- **Mail Preparation System**

The mail preparation process uses mail processing software: for address data entry, correction, deliverability, standardization, zip code correction and additions; to certify the accuracy of mail and maximize postal discounts for all classes of mail; and to create presort mailings, and separate mail, among other functions. Additionally, this software creates a print stream and the Mail Run Data File (MRDF). MRDF is a machine-readable barcode used by the insertion system for mail insertion, processing, and control purposes only. The software processes borrower PII data from financial systems of record to create hard copy loan servicing documents and Internal Revenue Service (IRS) tax forms.

- **Printing System**

The printing system consist of a print server, high-speed laser printers, a print queue manager. The print engine prints the jobs produced by the Mail Preparation System. The application processes PII created from the mail preparation system.

FOCUS - is a business intelligence tool that produces reports from data residing on the Mainframe and other applications (AMAS, GLS, LoanServ/DLOS, PLAS). FOCUS is not accessible by the public. The purpose of FOCUS is to provide a complete information control system with comprehensive features for entering, maintaining, retrieving, and analyzing data. RD mainly utilizes the end-user reporting features of the FOCUS software. FOCUS processes PII.

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?

- **AMP** - borrower and co-borrower names and addresses, social security numbers (last four positions), agency assigned numbers.
- **FOCUS** - borrower names and addresses, SSNs, financial data, agency assigned numbers.

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

- **AMP Mail Preparation**
 - Automated Multi-Family Account System (AMAS)
 - Guaranteed Loan System (GLS)
 - LoanServ
 - Multi-Family Integrated System (MFIS)
- **FOCUS (receives)**
 - Program Loan Accounting System (PLAS)
 - Automated Multi-Family Account System (AMAS)
 - Guaranteed Loan System (GLS)
 - LoanServ/DLOS

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

AMP - Information is processed to provide financial enterprise print and mail-handling services.

FOCUS - Information is collected for business intelligence purposes to support RD mission needs such as loan servicing, business analysis, data trending, and data analytics.

1.4 How is the information collected?

AMP - Information is collected from the financial accounting systems listed under Section 1.2 above.

FOCUS - All data is derived from other internal systems listed under Section 1.2 above.

1.5 How will the information be checked for accuracy?

AMP - Accuracy checks are done at the initial point of contact from the financial systems listed in Section 1.2.

FOCUS - RD staff provide regular review as part of the standard business processes to check information in these applications for accuracy and provide any necessary corrections, if applicable.

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

- Privacy Act of 1974, as Amended (5 U.S.C. § 552a)
- OMB Circular A-130, Managing Information as a Strategic Resource, July 2016
- Freedom of Information Act, as amended (5 U.S.C. § 552)
- Federal Information Security Modernization Act of 2014 (also known as FISMA), (44 U.S.C. §3551), December 2014
- Consolidated Farm and Rural Development Act (7 U.S.C. §1921, et. seq.) and Title V of the Housing Act of 1949 as amended (42 U.S.C. §1471, et. seq.)
- Farm Bill 2018 (P.L. 115-334)
- Fair Credit Reporting Act, 15 U.S.C. §1681f
- Consumer Credit Protection Act, 15 U.S.C. §1601, et. seq.
- Equal Credit Opportunity Act, 15 U.S.C. §1691, et. seq.
- The Fair Debt Collection Practices Act, 15 U.S.C. §162, et. seq.
- 7 CFR Part 3550, Direct Single Family Housing Loans and Grants
- 7 CFR Part 3555, Guaranteed Rural Housing Program
- 7 CFR Part 3560, Direct Multi-Family Housing Loans and Grants

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

AMP

MODERATE RISK- Given the amount/type of PII collected, this system is classified as a medium privacy risk. AMP processes PII information from internal applications located in a secure network environment within USDA.

MITIGATION - Any PII information is automatically deleted within 60 days of the creation of the print job. The information printed contains PII and appropriate administrative,

physical, and technical privacy controls are being applied. The AMP equipment is secured by a multi-level, defense-in-depth approach. The equipment is housed in a specifically controlled room in a secure facility with physical access controls at both the facility and room levels. Network connectivity is secured with VLAN isolation of the AMP equipment room and with a private network for the equipment. AMP does not use eAuth. Access to AMP functions is controlled by ACF2 administered by the User Access Management Team (UAMT). For each component, individual frequently changed password-protected accounts are required. Login can only be performed by physical access to consoles within the AMP equipment room. Data is encrypted in transit and at rest, in compliance with USDA requirements on protecting information.

FOCUS

MODERATE RISK: Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

MITIGATION: Data is stored in a secure environment. Authorization is required to access the applications.

Section 2.0 Uses of the Information

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

2.1 Describe all the uses of information.

AMP - Information is used in financial and management reports, as well as loan servicing and customer notification correspondence.

FOCUS produces reports from RD loan servicing and financial management data located on the DISC mainframe. FOCUS provides information with comprehensive features for entering, maintaining, retrieving, and analyzing data from loans and financial management data.

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

AMP - N/A, data is not analyzed.

FOCUS - Information Builders is used to analyze data and provide reports from the analysis. The reports have data analytics/business intelligence information.

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

AMP – N/A

FOCUS – N/A

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.

AMP – The National Institute of Standards and Technology (NIST) 800-53 controls for the AMP are discussed in detail in the System Security Plan. Controls are in place to erase memory in printers, remove media, internal traffic enhance protection, and protect the PII by keeping patches up to date. The equipment is in a secure environment where access is only granted to authorized personnel.

FOCUS – Controls are in place to detect unauthorized access and uses audit logs/security logs that track user login activity. E-Authentication or Active Directory authentication is used with the BI applications and there are audit logs that track user login activity.

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?

AMP - PII information from the mail/print jobs are deleted from the print display in 24 hours and then deleted from archive at 60 days.

FOCUS – reports are not scheduled and therefore held permanently.

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

AMP - No, AMP does not contain records covered by RD Records Management schedules in accordance with NARA.

FOCUS - No, discussions are underway with NARA to schedule records.

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

AMP – LOW RISK - PII information from the mail/print jobs are deleted from the print display in 24 hours and then deleted from archive at 60 days.

FOCUS - HIGH RISK: The risk associated with maintaining data permanently is high.

MITIGATION: RD is in the process of scheduling system records. Until data retention is scheduled, the data is safeguarded in accordance with NIST 800-53 security controls.

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?

AMP - AMAS, CLSS, GLS, LoanServ, MFIS – Loan information is submitted to AMP through the use of software on the Mainframe to create a Print Stream.

FOCUS shares financial management information with Farm Service Agency (FSA) to support loan and grant origination and processing and for business analysis, data trending, and data analytics in support of the RD mission.

4.2 How is the information transmitted or disclosed?

AMP - Loan information is submitted to AMP through the use of software on the mainframe to create a Print Stream. The software creates a Mail Run Data File (MRDF), a machine-readable barcode used by the insertion system for mail insertion, processing, and control purposes only.

FOCUS transmits information electronically via PDF, Excel, and using encrypted data files.

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.

AMP

LOW RISK: Access to the system is administratively, technically, and physically controlled. *See Section 1.7.* Data is encrypted in transit and at rest, in compliance with USDA requirements on protecting information.

FOCUS

MODERATE RISK: Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

MITIGATION: Data is stored in a secure environment. Access to the data is controlled by designated administrators, utilizing eAuthentication and Active Directory authentication to identify and authenticate the users. Data at rest and in transit is encrypted.

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?

AMP – N/A

FOCUS shares data with U.S. Department of Treasury Fiscal Service Treasury Web Application Infrastructure (TWAI). BI provides debtor and debt information for Treasury Offset Program and Cross Servicing, which is done for federal agencies. TWAI shares the full name, address information, and financial account information to TDW for the purpose of providing RD management with data to assist decision making. An ISA between TWAI and USDA agencies, including RD, governs and authorizes the sharing of federal financial information, as well as Privacy Act data, from TWAI into these USDA systems, including TDW.

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.

AMP – N/A

FOCUS – System of Record Notice (SORN) [RD-1](#), Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs, Routine Uses 3, 8, and 25.

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

AMP – N/A

FOCUS - An ISA between TWAI and USDA RD authorizes this data exchange and details the security controls in place.

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

AMP – N/A

FOCUS

MODERATE RISK: Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

MITIGATION: Data is stored in a secure environment. Access to the data is controlled by designated administrators, utilizing eAuthentication and Active Directory authentication to identify and authenticate the users. Data at rest and in transit is encrypted.

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.

AMP - No, AMP is not the initial point of collection nor are records created by AMP. See Section 3.2.

FOCUS - Yes, the system is covered by SORN USDA [RD-1](#), Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs.

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

N/A, neither AMP nor FOCUS are not the initial point of collection.

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

N/A, neither AMP nor FOCUS are not the initial point of collection.

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

N/A, neither AMP nor FOCUS are not the initial point of collection.

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.

N/A, neither AMP nor FOCUS are not the initial point of 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?

N/A, neither AMP nor FOCUS are not the initial point of collection.

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

N/A, neither AMP nor FOCUS are not the initial point of collection.

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

N/A, neither AMP nor FOCUS are not the initial point of collection.

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

N/A, neither AMP nor FOCUS are not the initial point of collection.

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

No additional risks are associated with the redress process. The requestor may also refer to the RD-1 SORN for additional information regarding Record Access Procedures.

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?

AMP - System access procedures are documented by the local system administrator and the User Access Management Team under the System Security Plan (SSP) (AC-02, Account Management). ACF2 is used to authenticate.

FOCUS The UAM Team creates, modifies, and deletes user requests approved by the System Point of Contact.

8.2 Will Department contractors have access to the system?

Yes

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

All RD employees and contractors are required to complete annual information security and awareness training, which includes privacy training.

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

This is a new boundary seeking a new ATO.

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

NIST 800-53 controls are discussed in detail in the SSP including the Audit and Accountability (AU) controls in place to prevent misuse of data. Access to FOCUS is controlled through Level 2 E-Authentication with audit logs of user activity for BI applications.

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?

AMP

LOW RISK: Privacy risk to AMP is low as mailrun/jobs are deleted after 24 hours from the production display and then deleted from archived at 60 days. Access is controlled administratively, physically, and technically. *See Section 1.7*. Data is also protected in transit and at rest. The NIST 800-53 controls are discussed in the SSP.

MITIGATION: Data is deleted after 60days.

FOCUS

MODERATE RISK: Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

MITIGATION: Data is stored in a secure environment. Authorization is required to access the applications. Potential compromise of privacy data is mitigated via audit monitoring, annual training and awareness, and USDA network security protections in place to protect RD data for all BI applications.

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?

AMP is a financial enterprise print and mail-handling service.

FOCUS processes information for business intelligence purposes to support RD mission needs such as loan servicing, business analysis, data trending, and data analytics.

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

AMP - Yes, the AMP system uses software to process data from financial systems of record and produce a Print Stream to hard copy loan servicing documentation and IRS tax forms. AMP produces hardcopy documents that contain PII to be sorted and packaged for proper mailing with the U.S. Postal Service.

FOCUS – 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, the system owner and the ISSPM have reviewed the OMB memorandums.

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

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?

N/A

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

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

Approval Signature

Signed copy kept on record.