UNITED STATES DEPARTMENT OF AGRICULTURE

Corporate Property Automated Information System CPAIS

Privacy Impact Assessment

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CONTENTS

Background **3**

Access to the Data **5**

Maintenance of Administrative Controls **9**

Introduction

The Office of the Chief Financial Officer/Associate Chief Financial Officer for Financial Systems (ACFO-FS) manages a range of systems that are used for the administrative and financial management of the United States Department of Agriculture. The ACFO-FS' mission is to provide effective and efficient tools that are used to ensure proper financial management of USDA agencies at the corporate level, and that adequate financial records are maintained for accountability and reporting to the Inspector General, Congress, other Federal agencies and to the public. The ACFO-FS accomplishes this by maintaining the corporate financial management system, the Foundation Financial Information System, corporate reporting through the Financial Statement Data Warehouse, agency reporting thorough the Financial Data Warehouse, an Automated Cash Reconciliation Work Sheet used for daily reconciliation with the United States Treasury, the Purchase Card Management System, the Travel System, the Personal Property System, and the Purchase Order System. All of the applications are critical to the overall mission of the USDA.

Requirements for Assessment

The Office of the Chief Financial Officer/Associate Chief Financial Officer for Financial Systems (ACFO-FS) is responsible for protecting the privacy, confidentiality, integrity, and availability of the data entrusted to its care. As such, ACFO-FS complies with the following USDA Departmental and Federal Regulations and Public Laws involving protecting the privacy of individuals.

- OMB Circular A-130, Management of Federal Information Resources
- Privacy Act of 1974 as Amended (5 USC 552a)
- Computer Security Act of 1987 (Public Law 100-235)
- Computer Matching and Privacy Act of 1988 (Public Law 100-503)
- Freedom Of Information Act (FOIA) as Amended (5 USC 552)
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Background

This is the Privacy Impact Assessment for the Corporate Property Automated Information System (CPAIS). CPAIS will serve as the USDA subsidiary ledger for owned property and the primary inventory reporting and portfolio management tool for all real property. CPAIS will maintain data elements necessary to track and manage owned property, leased property, General Services Administration (GSA) assignments, and inter agency agreements. CPAIS will record the acquisition, depreciation, and disposal of a real property asset, while the corporate financial system and the procurement subsidiary systems (e.g., the Integrated Acquisition System and the Purchase Order System) will continue to generate the financial transactions associated with the acquisition and use of real property. CPAIS will also track specific data elements necessary to meet external mandatory reporting requirements and ad hoc query requirements. CPAIS will interface with the GSA STAR website, and electronically file the 1166 Federal Real Property Profile (1166 FRPP), which was formerly titled "The Worldwide Inventory Report". CPAIS will demonstrate adherence to security, accessibility, and compliance policies governing Federal Government computer systems.

Data in the System

1. *Generally describe the information to be used in the system in each of the following categories: Employee, Other.*

The information used in CPAIS encompasses all data required for tracking acquisition of USDA owned or leased property, including GSA assignments and agreements. This may include the use of USDA employee data, government and commercial data, agency budget execution data, procurement data, financial data, and program and administrative information. Some of the information captured is TINS, different types of names and office addresses, phone numbers, and other identifying information.

2. What are the sources of the information in the system?

The source of USDA information comes from USDA agencies real property transactions, accounting and budget execution transactions, entering documents into the system, and from systems that interface with it. CPAIS must track USDA owned property for Work In Progress accounting, inventory reporting, and depreciation valuation purposes, regardless of whether the property was purchased or constructed by a USDA agency, or received through donation or exchange. CPAIS must interface with the corporate financial system to post financial transactions that are entered into the corporate financial system or automatically generated by the procurement subsidiary system (e.g., the Integrated Acquisition System and the Purchase Order System). CPAIS will function as the system of record for USDA owned and leased real property.

a. What files and databases are used?

All agencies will share a common ORACLE 9i database utilizing Advanced Security for encryption and Label Security for role based access control and interface files such as GSA rent data, corporate financial system files with owned and leased property financial data.

b. What Federal Agencies are providing data for use in the system?

CPAIS must interface with the corporate financial system to post financial transactions for owned property, interface with the General Service Administration System for Tracking and Accounting Real Property (GSA STAR) rent system to facilitate rent comparison, and interface with the Forest Service INFRA system for USDA agencies.

c. What State and Local Agencies are providing data for use in the system?

State and county offices that are part of the service center agencies provide transactions and updates to owned and leased property.

d. What other third party sources will data be collected from?

Not applicable.

e. What information will be collected from employees, commercial vendors and agencies using the system?

Only USDA employees and agencies will use CPAIS. Collected information includes unique security identifiers, names, office addresses, and global positioning coordinates.

3.a. How will data collected from sources other than USDA records be verified for accuracy?

As part of the real-time processing, system assurance processes verify the accuracy of the data. Documents reject when they do not have all the required information to process

through the system. Data integrity checks and edits are fundamental to basic CPAIS processing. CPAIS performs edits to ensure data integrity. The data comes from the corporate financial system, from GSA STAR, and from the agency unique INFRA system.

b. How will data be checked for completeness?

There is a series of checks and edits that CPAIS performs to ensure that all the data elements and other hash counts are in place for any incoming data whether from an external system or from an CPAIS entered transaction. It also reconciles the number of records that were staged to process through with the number actually processed to ensure there is a match. This further ensures that the data shared with others systems is complete and accurate.

c. Is the data current? How do you know?

The data in CPAIS entered on-line is processed in real-time and batch data is processed on a monthly basis. It matches to the corporate financial system, GSA STAR, and INFRA The edits ensure the updates are complete and accurate.

4. Are the data elements described in detail and documented? If yes, what is the name of the document?

Yes, Functional Requirements Analysis and Detailed Design of the Corporate Property Automated Information System (CPAIS).

Access to the Data

1. *Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?*

The users of CPAIS will have access to the data in the system based on job function, the principles of least privilege, the need-to-know, and the separation of duties. They will be located throughout all USDA agencies.

Managers within the agencies will have access that is based on their job function, the principles of least privilege, and the need-to-know the information. They have the ability to approve documents that require approvals, but they are not able to approve documents they enter themselves.

The CPAIS Security Administrator manage, within Office of Procurement and Property Management, the security tables within CPAIS. It is their job function to manage the users authority to update tables within the CPAIS, ensure the settings on the security tables reflect internal controls and monitor the system logs to check for unauthorized access.

The developers have read-only access to production data and update access is prohibited. Access is only granted after appropriate background investigations have been completed for these sensitive positions. These users are located at the Office of the Chief Financial Officer and the Office of the Chief Information Officer.

The USDA also has contractors that have access to the CPAIS. They have access that is limited to the function set forth in the contract. They can read the data in the system so they can provide technical and functional support. Contractors undergo background checks before they are allowed to access any data within the system.

Access to all systems is protected by authentication, encryption of passwords, and password aging. Security background investigations are required of all employees and contractors. All users, including contractors, have had security briefings about system security rules and must sign a document confirming that they understand the rules of behavior.

2. *How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?*

Access determinations are made through established the Office of the Chief Financial Officer/Associate Chief Financial Officer for Financial Systems policies and procedures that require each agency having access to the National Information Technology Center maintained and operated systems to appoint a Security Officer responsible for identifying the users by name and by their role in system operation. This allows the agencies to control access to their data, whether sensitive or non-sensitive.

All employees and contractors must have a completed the background investigation before access is granted based on job function and the need-to-know principle.

A Security Features User's Guide documents the CPAIS security rules, criteria, procedures, controls and the responsibilities of the Security Administrator. The criteria is listed for adding and removing users within the CPAIS, changing passwords, changing user profiles on security tables, and changing or building new security models. The guide provides a detailed explanation of the different functions of the security and how they fit into the agencies internal control and separation of duty functions. The Security Administrator monitors the systems security audit trail logs and reports to management, any types of unauthorized access attempts.

3. *Will users have access to all the data on the system or will the users access be restricted? Explain.*

User access will be restricted based on job function within the agency. The CPAIS system possesses discretionary access control, defining and controlling access between named users and named objects. These access controls will include or exclude access to the granularity of a single user. Only the Security Administrator will assign access to other users. A profile used on the users ID within the system will determine what data the user can view in the CPAIS. It is the responsibility of the users manager and the Security Administrator to ensure the proper paperwork is filled out and signed and that the right profile is attached to the user. Access is based on job function, the principles of least privilege, the need-to-know, and the separation of duties.

4. *What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?*

The system requires an identification and authorization procedure for users (e.g., user identification and password). The system protects authentication data and identifies each individual system user. If there is not a need-to-know on certain data elements, then the user will be restricted from seeing that data. To monitor this there are quarterly reviews conducted to see who has access within the system. Security Administrators determine if the user is still employed with the agency and if not that user is deleted from the system. They also monitor to see if job duties have changed, and when appropriate request a change to their profile to ensure the proper profile is attached. The system also keeps a log of security violations. These logs are monitored and any trends in violations are reported to management. Periodic audits are conducted on the security on the systems to receive independent opinions on system security.

5 a. *Do other systems share data or have access to data in this system? If yes, explain.*

Yes, the corporate financial system, agency specific systems, and the GSA STAR rent system interface with CPAIS. Documents from these systems are processed in real-time and nightly, checked for accuracy and completeness, then processed in batch jobs.

b. *Who will be responsible for protecting the privacy rights of the employees affected by the interface?*

All users, agencies, the Office of the Chief Financial Officer (OCFO), and the National Information Technology Center (NITC) have this responsibility.

6. a. *Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?*

Yes, CPAIS interfaces with the GSA STAR rent system to facilitate rent comparisons and to prepare and electronically submit the 1166 FRPP. The 1166 FRPP reports USDA-wide property inventory for owned and leased property. Additionally, once the E-Government Federal Asset Sales solution is operational, CPAIS will transmit disposals and excess property to auctions or other sales.

b. Who will be responsible for assuring proper use of the data?

The agencies, the OCFO, employees, end-users, managers, contractors, and Security Administrators all have the responsibility to assure the proper use of the data.

Attributes of the Data

1. *Is the use of the data both relevant and necessary to the purpose for which the system is being designed?*

Yes. The information collected and used is relevant and necessary to the property stewardship and financial management of the agencies within the USDA. Information collected on businesses is to record lease or ownership of USDA property.

2a. *Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?*

Yes, the data is currently dispersed on paper records.

b. *Will the new data be placed in the individuals record?*

No, it is placed within the context of lease or owned property.

c. Can the system make determinations about vendors or employees that would not be possible without the new data?

Yes, potentially about leasing agents or vendors.

d. How will the new data be verified for relevance and accuracy?

CPAIS end-users verify the accuracy of the data during data entry and after reviewing the reports.

3. a. *If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?*

There is restricted access to this application and monitoring of attempts at unauthorized access.

b. *If the processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.*

Yes, there is a set of internal controls and reviews conducted to prevent unauthorized access. Protection of data is a multi-layered approach. There is restricted access based on the user ID within the system, monitoring by security administrators and management for unauthorized access attempts, and security audits are conducted on the system. Security Test and Evaluations (ST&E's) are conducted at least every three years. Certification and accreditation addresses privacy risks.

4. *How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain?*

No data is retrieved by personal identifier. The data from the CPAIS can be retrieved during batch processing and by online inquiry. Users can query the data in the CPAIS using Oracle's Discoverer Reporting Tool. The users can retrieve data on this system by running scheduled reports or by ad-hoc queries.

What are the potential effects on the due process rights of employees of: consolidation and linkage of files and systems; derivation of data; accelerated information processing and decision making; use of new technologies?

Data is not collected on employees for this system. Information on vendors allow important decision-making on real property portfolios.

How are the effects to be mitigated?

Security policy, procedures, oversight audits and reviews are implemented to provide the required internal controls.

Maintenance of Administrative Controls

1. *a. Explain how the system and its use will ensure equitable treatment of employees.*

CPAIS does not track employee data.

b. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

CPAIS is a master database operated at the National Information Technology Center (NITC). The system is web-based and centralized. Agency data entered and controlled by each USDA agency. The Office of Procurement and Property Management (OPPM) reviews all data in their role as the departmental business process owner.

c. *Explain any possibility of disparate treatment of individuals or groups?*

Not applicable.

2. a. *What are the retention periods of data in this system?*

Data in CPAIS is cumulative and includes historical data. Files are kept for a minimum of twenty-five years to comply with Federal regulations regarding leases and property.

b. *What are the procedures for eliminating the data at the end of the retention? Where are the procedures documented?*

No files or data have been eliminated because the system is in the stage of being implemented. Data archiving processes are in the concept phase.

c. While the data is retained in the system, what are the requirements for determining if he data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

Audits require that data be retained. The data is accurate because the checks the CPAIS system does show if the system is and if records were dropped or not processed and could cause out of balance conditions.

3. a. *Is the system using technologies in ways that the USDA has not previously employed?*

No. The USDA is using latest hardware for its web-servers and the latest Oracle database and tools for property management of the entire Department. The USDA is using a secure web-based employing the latest technology and security, including SSL 3.

b. How does the use of this technology affect employee privacy?

There is sensitive property information on the system, however, security measures are taken to ensure that information is secure. All telecommunications are transmitted using a Virtual Private Network encryption to protect data. Data is encrypted in this way when it is transmitted over telecommunication lines. Passwords are stored using encrypted protocols to ensure security. Firewalls are used to protected both internal and external networks.

4. *a. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.*

No.

b. *Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.*

No, the system does not have the capability to monitor groups. The system maintains work schedule counts in order to compute space utilization only.

c. *What controls will be used to prevent unauthorized monitoring?*

Not applicable.

5. a. *Under which Systems of Record notice (SOR) does the system operate? Provide number and name.*

A Systems of Record notice (SOR) is being prepared and will be in place prior to initial operating capability.

b. If the system is being modified, will the SOR require amendment or revision? Explain.

Not applicable.