

USDA PRIVACY IMPACT ASSESSMENT FORM

Project Name: Electronic Disqualified Recipient System (eDRS)

Description of Your Program/Project: eDRS, a distributed web-based system, is replacing the existing DRS, a mainframe system. EDRS supports the fraud control function of the Food Stamp Program. It tracks data on disqualified individuals enabling States to assign the correct penalty to individuals being disqualified from the Food Stamp Program and to prevent participation by those in a disqualified status.

DATA IN THE SYSTEM

<p>1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.</p>	<p>Customer - Information on disqualified Food Stamp clients includes name, Social Security Number, date of birth and the disqualification record(s).</p> <p>Employee - Information on employees is limited to their name, user id, office, email address, phone number and related security privileges for access to various system functions.</p>
<p>2a. What are the sources of the information in the system?</p>	<p>Sources of information come from one source: State agencies submit data monthly on individuals disqualified from participation in the Food Stamp Program by the State agency.</p>
<p>2b. What USDA files and databases are used? What is the source agency?</p>	<p>None.</p>
<p>2c. What Federal Agencies are providing data for use in the system?</p>	<p>None.</p>
<p>2d. What State and Local Agencies are providing data for use in the system?</p>	<p>State agencies responsible for fraud investigation and prosecution provide the disqualification data.</p>
<p>2e. From what other third party sources will data be collected?</p>	<p>None.</p>
<p>2f. What information will be collected</p>	<p>Client data such as name, SSN, and date of birth, is collected at the time of</p>

from the customer/employee?	application for FSP benefits. Fraud investigative units in submitting disqualification records to eDRS then use that data. Data collected from employees, name, userid, business address, etc. is related to their job function and the need to ensure only authorized individuals use eDRS.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Computer edits and secondary verification, typically in the form of supporting documentation.
3b. How will data be checked for completeness?	Computer edits.

ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	<p>The primary users of the system are State agency FSP fraud control, eligibility and quality control staff and managers. Generally, eligibility and quality control staff will have read only access, while some fraud investigators will be granted data submission/correction rights.</p> <p>FNS Regional and Headquarters staff overseeing State agency operations and/or involved in the development of the eDRS will have access as will contractors responsible for system development. Only State agencies will have data submission rights, not FNS or contractor staff.</p>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Access to the system will follow FNS existing processes using the form 674, eAuthentication. Users access rights are processed through CSAMS.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	Access to the system will be granted to classes of users and to users individually. Users will have access to all data on a need to know basis only. There must be a specific need for users to access eDRS, such as establishing the eligibility of a particular individual.
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	An audit trail of user request for searches and reports of certain data is recorded. An audit trail of changes to system data is captured for later review.

<p>5a. Do other systems share data or have access to data in this system? If yes, explain.</p>	<p>No.</p>
<p>5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.</p>	<p>FNS security officers and IAW USDA or FNS policy.</p>
<p>6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?</p>	<p>Only as permitted under the disclosure provisions of section 272.1 (c) of the FSP regulations.</p>
<p>6b. How will the data be used by the agency?</p>	<p>The data will be used to determine the appropriate penalty to assign individuals being disqualified from participation in the FSP. It will also be used to determine the eligibility (disqualification status) of individuals applying for participation in the FSP.</p>
<p>6c. Who is responsible for assuring proper use of the data?</p>	<p>State and FNS' staff under established security procedures.</p>

ATTRIBUTES OF THE DATA

<p>1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?</p>	<p>Yes.</p>
<p>2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?</p>	<p>Yes. The system does not create new data but does make available to all States data submitted by the individual States.</p>
<p>2b. Will the new data be placed in the individual's record (customer or employee)?</p>	<p>No new data as such. Data in the system reflects what is already in client case files.</p>
<p>2c. Can the system make determinations about customers or employees that would not be possible without the new data?</p>	<p>Yes. A State may determine eligibility and assign disqualification penalties based on information submitted by other States.</p>
<p>2d. How will the new data be verified for relevance and accuracy?</p>	<p>State agencies submitting the data to eDRS will be asked to provide supporting documentation prior to any adverse action being taken against an individual due to the disqualification record in eDRS.</p>
<p>3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?</p>	<ul style="list-style-type: none"> - Physical access to the servers is protected by the FNS approved policy and procedures at a contractor site. - Electronic access to the servers is protected by firewalls and network security. - The application is protected by authorization and authentication at the application level. - Intrusion detection devices will monitor the servers that are available to the public. - EIN and SSN data is stored encrypted in the database.
<p>3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.</p>	<p>Processes are being consolidated and the controls will remain in place via the applications implementation of security privileges at the role and individual level.</p>
<p>4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.</p>	<p>Yes. The data will be retrieved by searches based on the clients SSN or name. Clients provide personal information for the FSP application. State eligibility workers may use that information to search eDRS to</p>

	determine whether the applicant is currently disqualified from participation. Also, the FSP has an escalating scale of penalties, based on the number of prior disqualifications, for those guilty of intentional Program violations. Fraud investigators, in the course of disqualifying an individual, will search eDRS to determine whether and how many prior disqualifications an individual may have had in order to assign the proper penalty.
4b. What are the potential effects on the due process rights of customers and employees of: <ul style="list-style-type: none"> • consolidation and linkage of files and systems; • derivation of data • accelerated information processing and decision making; • use of new technologies. 	There is no change in FNS' Food Stamp Program law, regulations or procedures protecting customers and employees due process rights under the new system.
4c. How are the effects to be mitigated?	Established procedures will continue and be maintained.

MAINTENANCE OF ADMINISTRATIVE CONTROLS

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	The system will be used to help ensure that only eligible individuals receive benefits and that those disqualified receive the proper penalty .
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	Not applicable.
2b. Explain any possibility of disparate treatment of individuals or groups.	None.
2c. What are the retention periods of data in this system?	Indefinite; until the individual whose record is in eDRS has died or the individual reaches their 80 th birthday. Individuals may be permanently disqualified from the FSP. Therefore, records must be maintained until the individual is no longer able to participate. To relieve State agencies of some of the record-keeping burden, FNS allows for the purging of eDRS and supporting records when individuals reach the age of 80.

<p>2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?</p>	<p>State agencies delete the records from eDRS. Procedures are documented in the FNS Instruction 270-1.</p>
<p>2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?</p>	<p>No adverse action may be taken against an individual based on the data in this system without obtaining supporting documentation of the data.</p>
<p>3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?</p>	<p>No.</p>
<p>3b. How does the use of this technology affect customer/employee privacy?</p>	<p>An established Privacy Act system of records has been in place that is governed by the Privacy Act.</p>
<p>4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u>? If yes, explain.</p>	<p>No.</p>
<p>4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u>? If yes, explain.</p>	<p>No.</p>
<p>4c. What controls will be used to prevent unauthorized monitoring?</p>	<p>Not applicable</p>
<p>5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.</p>	<p>Notice of New Privacy Act System of Records –</p>
<p>5b. If the system is being modified, will the SOR require amendment or revision? Explain.</p>	<p>No, because we're just converting the existing mainframe system into a web-based application. We're still collecting the same information to be inputted.</p>