



**Privacy Impact Assessment
(PIA)
Cooperative Marketing Association System
(CMA)**

Revision: 1.05



Farm Service Agency

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Privacy Impact Assessment for
Cooperative Marketing Association System (CMA)



Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	July 6, 2009	Scott Tanos	<i>Initial version</i>
1.02	July 7, 2009	Scott Tanos	Populated sections 3, 4 and 5 from previous PIA
1.03	July 30, 2009	Mike Pace	Update by application point of contact
1.04	July 31, 2009	D.Brizendine	Updated responses for questions 2.1, 24, 25, 26, 26.1; document review; template updates
1.05	8/5/09	Mike Pace	Updated 14.1, 14.2 and 18.1



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1 Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner’s requirements presents any threats to privacy.”

The Privacy Impact Assessment (PIA) document contains information on how the **Cooperative Marketing Association System (CMA)** affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.



2 System Information

System Information	
Agency:	Farm Service Agency
System Name:	Cooperative Marketing Association System
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p>The FSA Cooperative Marketing Association System (CMA) is a National Computer System that is designed, maintained and operated to allow marketing cooperatives the ability to provide Cooperative Marketing Associations (CMAs) and Loan Servicing Agents (LSAs) timely and accurate eligibility, farm record and payment limitation data in order to determine producer eligibility for obtaining marketing assistance loans, loans and loan deficiency payments (LDP) through CMA's, LSAs and DMAs.</p>
Who owns this system? (Name, agency, contact information)	<p>Sharon Marshall FSA/ITSD/ADC/PARMO (816) 926-2133 Sharon.Marshall@kcc.usda.gov</p>
Who is the security contact for this system? (Name, agency, contact information)	<p>Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 Brian.Davies@wdc.usda.gov</p>
Who completed this document? (Name, agency, contact information)	<p>Mike Pace (816) 926-6599 mike.pace@kcc.usda.gov</p>



3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	SS #s, Tax ID #s, Farm #s
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	7 U.S.C. 135b, 450j, 450k, 405l, 1281-1393, 1421-1449, 1461-1469, 1471-1471i, 1781-1787; 15 U.S.C. 714-714p; 16 U.S.C. 590a-590q, 1301- 1311, 1501-1510, 1606, 2101-2111, 2201-2205, 3501, 3801-3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	CMA's
4.1	What data is being collected from the customer?	Customer SS #s, Tax ID #s, Farm #s
4.2	What USDA agencies are providing data for use in the system?	FSA
4.3	What state and local agencies are providing data for use in the system?	None
4.4	From what other third party sources is data being collected?	CMA's
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.



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No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Manual and technical processes are used Reports and reasonability checks are performed. Error messages in system are generated when numbers do not match. These messages are investigated. Periodic reviews to confirm producers.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Manual and technical processes are used Reports and reasonability checks are performed. Error messages in system are generated when numbers do not match. These messages are investigated. Periodic reviews to confirm producers.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Manual and technical processes are used Reports and reasonability checks are performed. Error messages in system are generated when numbers do not match. These messages are investigated. Periodic reviews to confirm producers.

3.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	Provide Cooperative Marketing Associations (CMAs) and Loan Servicing Agents (LSAs) timely and accurate eligibility, farm record and payment limitation data in order to determine producer eligibility for obtaining marketing assistance loans, loans and loan deficiency payments (LDP) through CMA's, LSAs and DMAs
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	



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No.	Question	Response
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	System messages and manual validations
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	N/A
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	Secure DB2 tables



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No.	Question	Response
13	Are processes being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	User ID and password validation.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Data stays in the active system for 3 years. Backups are taken at the end of the cycle (twice weekly) are kept for 60 days. Backups taken weekly for DR are kept for 60 days.
14.2	What are the procedures for purging the data at the end of the retention period?	Data is purged once a year to start the next fiscal year processing. Any data older than 2 years is also purged at that time.
14.3	Where are these procedures documented?	Purging procedure documentation located at K:\applications\DBMO-APPS\db2\oS390\mcx_CMA_System\PLANS\CMA 2009 rollover in PROD.doc
15	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?	Data is rolled over yearly. Current year data is used
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.



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No.	Question	Response
17.1	How will the data be used by the other agency?	N/A
17.2	Who is responsible for assuring the other agency properly uses the data?	N/A
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	N/A
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	N/A

3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Cooperatives, who are assigned a unique user ID; County offices grant role-based access to the cooperatives; Developers and Managers.
21	How will user access to the data be determined?	Access is determined by marketing agreement to cooperative
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	Access is restricted by User ID and Password. Users access the data via FTP from the CMA office.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



3.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at john.underwood@kcc.usda.gov & 816.926.6992
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. Common FSA incident reporting process. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	The same system is used for every customer. There is no potentially discriminating identification data collected and used.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	



4 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	SSN/ID # can be used to retrieve data. CMAs can access data for members only.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	USDA/FSA-2 – Farm Records File (Automated) USDA/FSA-14 – Applicant/Borrower
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	N/A



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6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.