



**Privacy Impact Assessment
(PIA)**

**Tobacco Transition Payment Program
(TTPP)**

Revision: 1.06



Farm Service Agency

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Privacy Impact Assessment for
Tobacco Transition Payment Program (TTPP)



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 8, 2009	D.Brizendine ISO	Populate Sections 3,4,5 from previous doc
1.03	July 20, 2009	D.Brizendine ISO	Updated System Owner Information
1.04	July 21, 2009	Jack Meis	Review and update
1.05	July 23, 2009	D.Brizendine	Updated questions 24, 25, 26, 26.1
1.06	July 24, 2009	D.Brizendine	Document Review; pulled Michael Boyles signature to TTPP signature page
FINAL	July 29, 2009	S.Nuessle	Final



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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 **Tobacco Transition Payment Program** 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 (FSA)
System Name:	Tobacco Transition Payment Program
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:	The Tobacco Transition Payment Program (TTPP) is mandated by The American Jobs Creation Act of 2004. This program will end all USDA interest in the federal tobacco marketing quotas and price support loans. Under this legislation, between 9.6 and 10.14 billion dollars worth of payments are to be made to more than 670,000 tobacco quota holders and producers. This will be a 10 year program, with the last of the payments being made in 2014.
Who owns this system? (Name, agency, contact information)	C. Michael Boyles U.S. Department of Agriculture Farm Service Agency Beacon Building (816) 926-1905 mike.boyles@kcc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	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
Who completed this document? (Name, agency, contact information)	Jack W. Meis Farm Service Agency ISTD/ADC/PSCAO/SFG (816) 823-1809 jack.meis@kcc.usda.gov



3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer: The customer will receive a contract and a confirmation form with the number of pounds to be paid and the dollar amount per pound. Employee: The employee will use farm data and base quota level data to create the contract for the customer.
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.	Pub. L. 108-357. This authority allows for the collection of information without prior OMB approval mandated by the Paperwork Reduction Act of 1995.
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 Yes, only required data was captured: tax payer id, id type, farm number, tract number, base quota level (BQL).
4	Sources of the data in the system.	USDA/FSA only; The data to load the SQL data base came from the upload of the county files (CAD/NASS tapes). The requirements in the User Requirements were applied before the database was loaded.
4.1	What data is being collected from the customer?	The customer and the employee will validate the data provided on the database and make changes as required (tax payer id, id type, farm number, tract number, base quota level).
4.2	What USDA agencies are providing data for use in the system?	FSA TTPP SQL database, SCIMS, NPS, Subsidiary Eligibility, AGI, MRT, Obligations, eFunds



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No.	Question	Response
4.3	What state and local agencies are providing data for use in the system?	FSA County Service Centers
4.4	From what other third party sources is data being collected?	Copies of Land deeds, estate documents and other agreements will be collected and filed as paper copies.
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.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Land deeds and other agreements will be checked by the county tax office, etc. Data will be verified against S/36 reports and queries.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Land deeds and other agreements will be checked by the county tax office, etc. Data will be verified against S/36 reports and queries.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Land deeds and other agreements will be checked by the county tax office, etc. Data will be verified against S/36 reports and queries.

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?	The data will be used to perform authorized functions within the application and to create reports for access to those who have the appropriate rights to view the data. All PII data within a report will be masked according to standards and encrypted prior to transmission.
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?	Does Not Apply



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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 Only required data was/is captured: tax payer id, id type, farm number, tract number, base quota level (BQL).
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. The payment amount will be calculated by multiplying the BQL by \$7 per pound for quota holders and \$1 per pound for each of 3 years (2002, 2003, and 2004) of production for producers.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input checked="" type="checkbox"/> Yes - for 1099 reporting <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?	Cross checks to S/36 reports and hardcopy records.
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?	Calculating and making payment requests for the individuals whose information is being collected. Reporting of the payments made to the individual and the IRS.
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?	Does not apply
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.



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No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	Both eAuth and EAS for authentication and role-based authorization.
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?	Changing passwords, new passwords, call back features of routers to associations, password verifications, system monitoring

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?	At least fifteen years.
14.2	What are the procedures for purging the data at the end of the retention period?	Standard procedures are used, as documented in various handbooks, such as the FSA 25-AS
14.3	Where are these procedures documented?	Standard procedures are used, as documented in various handbooks, such as the FSA 25-AS
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?	There are checks and balances in the system for any one farm's records. Third party reviews were completed on all contracts in the county offices before any were paid.
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.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	



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No.	Question	Response
18	Is the data transmitted to another agency or an independent site?	<input checked="" type="checkbox"/> Yes <input 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?	Yes.
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input 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?	The software and the database are centrally located; accessible via the web. Notices will be used to inform the counties of proper usage.

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.)?	County Office Users, System Administrators, Managers, Application Support representatives, developers
21	How will user access to the data be determined?	By using FSA's standard security with logins verified through eAuth and EAS.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No By using FSA's standard security with logins verified through eAuth and EAS.
22	How will user access to the data be restricted?	Access is restricted based on county. Must have administrator rights to change passwords, etc. Application Support, State and National users will have read only access to reports.
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 Both eAuth and EAS are used for authentication and role-based authorization.



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?	Does not apply
28	How will the system and its use ensure equitable treatment of customers?	Through the standard manual process as dictated by FSA.
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.)?	The user must login with ID and password to access data. Yes, data can be displayed and/or modified by farm serial number, tax payer id or contract number.
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)
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes - Possibly if the modification results in data, record storage location, or routine use that is not covered by the SORN identified above. <input type="checkbox"/> No



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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?	



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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.