



Rural Development Privacy Impact Assessment Multi-Family Housing (MFH)

(Multi-Family Integrated System)

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Prepared by:



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Multi-Family Information System (MFIS)/
Management Agent Interactive Network Connection (MINC)

USDA PRIVACY IMPACT ASSESSMENT FORM

Project Name: MFIS/MINC

DESCRIPTION OF MFIS/MINC:

MFIS is one of USDA's official accounting support systems for the Multi-Family Housing program in Rural Development. MFIS is an online transaction entry and inquiry support system accessed by over 200 field offices, the National Office, and Finance Office. Updates are done both on-line real-time and through nightly batch processes. The field offices are the primary user of MFIS and the Finance Office has overall operational, financial, and accounting responsibility for Rural Development. Our external trusted partners (Management Agents) provide tenant and budget status data via file uploads from a Management Agent Interactive Network Connection (MINC) to the data server during the monthly recertification periods. These files are verified for data exceptions and processed throughout each day during scheduled processing timeframes. MFIS functions include: online inquiry and transaction input; tenant and budget processing, supervisory activity and findings updates, project details and units, customer management, rent schedule, tracked accounts, program reporting; and project payment collection.

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: Management agent, borrower and key member names and social security numbers. Borrower debt payment information. Project housing unit and rent information.</p> <p>Tenant Information: Tenant household information including name, social security numbers and financial information.</p>
<p>2a. What are the sources of the information in the system?</p>	<p>Tenant status information is provided to Rural Development by management agents who manage the properties of borrowers. This information is received in separate data files transmitted through the MINC system. Also, data entry screens are completed via the web by RD Area Specialists for borrowers who do not participate through MINC. Batch feeds are obtained nightly from the AMAS mainframe system for borrower and project detail information.</p>
<p>2b. What USDA files and databases are used? What is the source agency?</p>	<p>This system's platform is HP – Unix 11 with service guard. MFIS uses an Oracle database. MFIS utilizes NT servers located within the St. Louis Web farm as a front-end to the MFIS entry/inquiry system. MFIS has Oracle data servers executing code created through the use of Coolgen tools. These data servers are located behind agency firewalls and connect to the</p>

	web servers via HTTPS secure.
2c. What Federal Agencies are providing data for use in the system?	USDA Area Specialists for inputting tenant and budget information not received via MINC. Trusted Management Agents for inputting tenant and budget information via MINC. RD Finance Office inputting loan information into AMAS received via nightly downloads.
2d. What State and Local Agencies are providing data for use in the system?	None
2e. From what other third party sources will data be collected?	None
2f. What information will be collected from the customer/employee?	Information included contains social security numbers of borrowers, management agents, key members, and tenant social security numbers, debt payment information, customer names, tenant names, addresses, and business financial data.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	There is no other source of information.
3b. How will data be checked for completeness?	Same as 3a.

ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	USDA RD MFIS system users and managers, MFIS Systems Administrators, MFIS Trusted Management Agents.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	<p>The controls in place to identify users and system personnel within the MFIS are documented in the MFIS Systems Security Plan, Section 6.</p> <p>MFIS access is controlled by User ID and password. Access rights are granted to designated individuals only when a written request is approved by their supervisor, the site system manager and the ISSPM.</p>
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	<p>No, users do not have access to ALL DATA on the system.</p> <p>Privileges granted are based on job functions and area of authority (e.g. State office user with authority for their state only).</p>
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	<ul style="list-style-type: none"> . The applications capability to establish access control lists (ACL) or registers is by based upon the basic security setup of the operating system. . Application users are restricted from accessing the

	<p>operating system, other applications, or other system resources not needed in the performance of their duties via access given to user Ids limited to what is needed to perform their job.</p> <ul style="list-style-type: none"> i. The controls used to detect unauthorized transaction attempts are security logs/audit trails. j. Users are required to have password-protected screensavers on their PC's to prevent unauthorized access. k. Warning banners are used to warn and inform users who sign on to the system that this is a secure and private network. Warning banners are in compliance with USDA guidelines.
5a. Do other systems share data or have access to data in this system? If yes, explain.	MFIS is not connected to any external systems. The system utilizes input from the AMAS system and supplies input to the AMAS system through files during certain update cycles of the respective data bases. The system supplies a file to the RD data warehouse.
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	Fred McGavran Chief, Multi-Family Housing St. Louis, MO 314-335-8594
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	No.
6b. How will the data be used by the agency?	To create and process Project servicing activities with USDA and trusted Management Agents.
6c. Who is responsible for assuring proper use of the data?	Fred McGavran Chief, Multi-Family Housing St. Louis, MO 314-335-8594

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 data attributes provide Project servicing information.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	Yes. The system generates a project worksheet. This instrument calculates the overage, RA and final payment for all projects on a monthly basis.
2b. Will the new data be placed in the individual's record (customer or employee)?	Yes. The systems stores a monthly record of the payment attributes.

2c. Can the system make determinations about customers or employees that would not be possible without the new data?	No. It is the system's job to assemble household and project detail information to determine monthly payments.
2d. How will the new data be verified for relevance and accuracy?	The data is reviewed by area specialists and transferred to the project management agents. These management agents verify the data against their own records and approve the final payment details.
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	<ol style="list-style-type: none"> 1. The applications capability to establish access control lists (ACL) or registers is based upon the basic security setup of the operating system. 2. Application users are restricted from accessing the operating system, other applications, or other system resources not needed in the performance of their duties via access given to user IDs limited to what is needed to perform their job. 3. The controls used to detect unauthorized transaction attempts are security logs/audit trails. 4. Users are required to have password-protected screensavers on their PC's to prevent unauthorized access. 5. Warning banners are used to warn and inform users who sign on to the system that this is a secure and private network. Warning banners are in compliance with USDA guidelines.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Yes. The controls in 3a still apply.
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Data is retrieved by MFIS authorized users through login IDs using ACF2 IDs which are verified on the NITC Mainframe. Access is restricted down to the state district level.
4b. What are the potential effects on the due process rights of customers and employees of: consolidation and linkage of files and systems; derivation of data accelerated information processing and decision making; use of new technologies.	<p>The only employee data is the user id for audit trail purposes.</p> <p>There is no new technology impact that will affect due process rights of customers or employees.</p>
4c. How are the effects to be mitigated?	There are no effects to mitigate.

MAINTENANCE OF ADMINISTRATIVE CONTROLS

1a. Explain how the system and its use	MFIS is used for Project servicing processing only. There is no subjectivity or decision making based on
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will ensure equitable treatment of customers and employees.	an individual customer or employee by the MFIS system.
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?	The entire system is hosted in the STL web farm. Access is through user terminals which are in the web farm.
2b. Explain any possibility of disparate treatment of individuals or groups.	MFIS is used for Project data storing and processing only. There is no subjectivity or decision making based on an individual customer or employee by the MFIS system.
2c. What are the retention periods of data in this system?	The system stores 3 years (or last 3 items) for annual data. Non-annual data has infinite retention.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Annual data is shipped to the data warehouse via files produced on a monthly basis. Procedures are in place to assure that once data is no longer needed, it is properly destroyed. Methods such as overwriting the entire media, de-gaussers, and disk formatting are used, but strict attention is paid to whatever process is selected to ensure that all unneeded data is completely destroyed. Papers and other soft materials, such as microfiche and floppy disks, are shredded.
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?	Data integrity controls are used to protect data from accidental or malicious alteration or destruction and to provide assurance to the user that the information meets expectations about its quality and that it has not been altered. Validation controls refer to tests and evaluations used to determine compliance with security specifications and requirements.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	To avoid costly retrofitting of safeguards, sensitivity was afforded importance early in the life cycle. The needs for information protection were established during the initiation, development, and operation phases, and will be afforded appropriate review when termination occurs. To ensure that adequate safeguards, alternatives, and rules are in place and implemented this system is reevaluated periodically.
3b. How does the use of this technology affect customer/employee privacy?	None
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	The system records an audit trail of who changes what data. This is used to identify how and when data changes were made that warrant explanation.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No.
4c. What controls will be used to prevent	Firewall protection to the data servers and secure

unauthorized monitoring?	transfer protocol for web communications.
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	MFIS and MINC operate under SOR notice USDA/RURAL DEVELOPMENT-1.
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	Not Applicable. The system is not undergoing modification but is undergoing certification and accreditation requiring the confirmation of a systems of record notice and privacy impact assessment.