



Rural Development Privacy Impact Assessment

Program Fund Control System (PFCS)

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Description of (PFCS)

PFCS provides funds control for the Farm Service Agency and Rural Development loan and grant programs. Congress appropriates the funds for the loan and grant programs for specific purposes in the support of the farmers and the rural community. Program Fund Control System (PFCS) is a Commercial Off The Shelf (COTS) product with some customization to meet selected Farm Service Agency/Rural Development (FSA/RD) business requirements and development of software processes to interface with required legacy systems.

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>USDA employees use the PFCS to control funds appropriated by congress for specific purposes in support of the farmers and rural community.</p>
<p>2a. What are the sources of the information in the system?</p>	<p>Sources of the information include Congressional appropriated funds approved by the Office of Management and Budget (OMB). Using the OMB, approved apportionments, USDA enters allotments and allocations of funds for specific and targeted areas on the PFCS. Processed obligations from Customers including farmers and lenders are entered by USDA employees in accounting systems that interface to PFCS. USDA authorized employees enter the information stored in PFCS.</p>
<p>2b. What USDA files and databases are used? What is the source agency?</p>	<p>PFCS uses an Oracle relational data base management system. USDA files that interface to PFCS include obligation data from the USDA Program Loan Accounting System, the Guaranteed loan System, the Rural Utilities Loan and Grant System and the Water and Environmental Program. The source agencies are the Farm Service Agency and Rural Development.</p>
<p>2c. What Federal Agencies are providing data for use in the system?</p>	<p>The Office of Management and Budget provide the approved apportionments by Treasury Symbol. FSA and RD use PFCS for control and management of congressionally approved funds.</p>
<p>2d. What State and Local Agencies are providing data for use in the system?</p>	<p>No state and local agencies provide data.</p>

2e. From what other third party sources will data be collected?	No third party sources provide data.
2f. What information will be collected from the customer/employee?	The source of the data is USDA accounting systems that is passed to PFCS. The transaction from the accounting systems includes customer social security number or federal tax id. The employee data collected includes the system user id for audit trail purposes.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Only data from USDA records is used in PFCS.
3b. How will data be checked for completeness?	USDA uses separation of duties for all financial and accounting functions. Only authorized, reviewed and approved transactions will be allowed to process on PFCS. Other government over-site agencies such as the General Accounting Office (GAO) and the Office of Inspector General (OIG) also provide review.
3c. Is the data current? How do you know?	The RD and FSA Finance Offices review the data daily via reports. We also have multiple system check-points in place which notify the system administrators/operators verifying that all jobs run to completion.
4. Are the data elements described in detail and documented? If yes, what is the name of the document?	The PFCS Configuration Document

ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	Update authority for PFCS is limited to FSA and RD employees in the respective Budget Offices, Program Offices, Financial Management Divisions, and System Administrators. Inquiry authority is limited to authorized representatives in USDA field offices, software developers and the government over-site agencies mentioned in 3b.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and	Access to the data is determined by user group job function and need to know. All criteria, procedures, controls and responsibilities regarding access are

responsibilities regarding access documented?	documented.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	User access to data will be restricted by user id and job function.
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Access is limited by user id. There is an audit trail of any updates to the data. USDA employees are provided with a warning message when entering PFCS. Employees are bound by USDA rules and regulations.
5a. Do other systems share data or have access to data in this system? If yes, explain.	RD and FSA accounting systems interface to PFCS for funds control for obligation processing. In addition, PFCS interfaces to the accounting systems and provide reporting and accounting system data on a periodic basis.
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	None of the data that is interfaced back to the RD and FSA accounting systems is new customer or employee data.
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	Government over-site agencies such as OMB, the General Accounting Office (GAO) and the Office of Inspector General (OIG) have access.
6b. How will the data be used by the agency?	The data is used to ensure that FSA and RD fulfill their mission.
6c. Who is responsible for assuring proper use of the data?	The Financial Officers and Program Staffs assure proper use of the data. OIG, OMB and GAO provide over-site within their respective agencies.

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. Funds control is required by law to prevent “anti-deficiency”, spending more money than is appropriated by Congress.</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>This system does not derive or create any new available data about individuals. No individual or employee data is aggregated from the feeder systems.</p>
<p>2b. Will the new data be placed in the individual’s record (customer or employee)?</p>	<p>There is no new data in PFCS. PFCS is strictly a funds control system to prevent over spending of appropriated funds.</p>
<p>2c. Can the system make determinations about customers or employees that would not be possible without the new data?</p>	<p>No personal decisions are made in PFCS concerning customer or employees.</p>
<p>2d. How will the new data be verified for relevance and accuracy?</p>	<p>No new data concerning customers or employees is in PFCS.</p>
<p>3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?</p>	<p>There is no data consolidation for customer or employee in PFCS.</p>
<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 and data are not being consolidated. USDA users will have access to PFCS residing on the RD Web Farm.</p>
<p>4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.</p>	<p>Some limited retrieval of transaction data by borrower id will be conducted to research out of balance conditions.</p>
<p>4b. What are the potential effects on the due process rights of customers and employees of:</p> <ul style="list-style-type: none"> • consolidation and linkage of files and systems; 	<p>There is very limited data on PFCS. The actual borrow information resides on the RD and FSA loan accounting system. PFCS just checks if there is money for the loan to process. PFCS is not used for customer decision making. The only</p>

<ul style="list-style-type: none"> • derivation of data • accelerated information processing and decision making; • use of new technologies. 	<p>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 will ensure equitable treatment of customers and employees.	PFCS is used for funds control only. There is no subjectivity or decision making based on an individual customer or employee on the PFCS.
1b. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	PFCS is only operated at one site.
1c. Explain any possibility of disparate treatment of individuals or groups.	PFCS is used for funds control only. There is no subjectivity or decision making based on an individual customer or employee on the PFCS.
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 system is operated at the RD Web Farm in St. Louis, MO.
2b. Explain any possibility of disparate treatment of individuals or groups.	PFCS is used for funds control only. There is no subjectivity or decision making based on an individual customer or employee.
2c. What are the retention periods of data in this system?	FSA recently issued regulations that data must be kept indefinitely.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	FSA recently issued regulations that data must be kept indefinitely.
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>FSA recently issued regulations that data must be kept indefinitely.</p> <p>There is no subjectivity or decision making based on an individual customer or employee.</p>

3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	There are no new technologies introduced by PFCS. While a web-based funds control system is new, web-based technology is not new to USDA.
3b. How does the use of this technology affect customer/employee privacy?	There is no technology impact to affect customer/employee privacy.
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	No.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No monitoring of groups of people occurs on PFCS.
4c. What controls will be used to prevent unauthorized monitoring?	There is no technology impact to affect customer/employee privacy.
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	PFCS operates under SOR notice USDA/RURAL DEVELOPMENT-1.
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	A change control process is in place whereby all changes to application software are tested and user approved prior to being installed into production. Changes to the applications are controlled by specific written requests for automation. Test results are kept until the turnover release warranty is expired and used as reference if necessary. Emergency fixes are handled in the same way as more extensive fixes except that they take priority over all other activity. There are no "hot keys" activated to facilitate the correction of data.