



Rural Development Privacy Impact Assessment

Rural Utilities Loan Servicing System

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Prepared by:



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Table of Contents

USDA PRIVACY IMPACT ASSESSMENT FORM.....	1
DESCRIPTION OF RULSS:	1
DATA IN THE SYSTEM.....	2
ACCESS TO THE DATA	3
ATTRIBUTES OF THE DATA.....	4
MAINTENANCE OF ADMINISTRATIVE CONTROLS	5

USDA PRIVACY IMPACT ASSESSMENT FORM

Project Name: Rural Utilities Loan Servicing System (RULSS)

Description of RULSS:

RULSS is being developed to replace the old, obsolete, labor-intensive Rural Utilities Service (RUS) legacy system. The system will provide a complete program management and financial information system, utilizing state-of-the-art technologies. It will be a totally integrated system with seamless interfaces to other agency systems.

This system will replace the Cable Television, Federal Finance Bank (FFB), Rural Telephone Bank (RTB), and the RUS loan accounting systems, as well as various other personal computer (PC) applications currently being utilized. These systems maintain accountability and provide authorization for advancing approved Rural Electric and Telephone funds, RTB funds, and FFB funds to borrowers. Once funds have been advanced, the system bills borrowers, processes payment collections from the borrower, maintains prepayments and delinquent payments, and manages irregular borrower, situations. This system also handles deferments for Rural Development projects and Energy Resource Conservation loans directed toward electric borrower's consumers. Additionally, "B Stock" and "C Stock" dividends are calculated, and the dividends are reported to the Internal Revenue Service.

RULSS also includes the Water and Environmental Programs Module, which will include the functionality to pull in application data from the Community Program Application Program and generate an obligation through the Program Loan Accounting System.

CPAP is a tool used by RUS personnel to process Water & Waste loan and grant applications. The data entered in this system includes all data required for completion of forms needed to process the obligation of the loan/grant. Data is entered on the Client CPAP program and is stored on an SQL Server in the Web Farm. The data is used on the Client program primarily to print forms. Each night the data is also transferred to the Data Warehouse for reporting.

There are no external users for RULSS or CPAP at this time.

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>RULSS: <u>Customers</u> RULSS tracks participants (i.e. customers) in Rural Utilities Service (RUS) loan and grant programs as "Borrowers" in a database including their Taxpayer Identification Number, address information, contact personnel, legal name, financial disposition, and payment status.</p> <p>RULSS: <u>Employees</u> RULSS maintains contact information for USDA account representatives and their associations with Borrowers.</p> <p>RULSS: <u>Other</u> RULSS maintains Congressional Districts and representative contact information; Financial Institution information, including account, bank routing, and contact information associated with the Borrowers in the system; information about CPA firms responsible for the auditing of Borrowers.</p> <p>CPAP: Employees CPAP is a tool used by RUS personnel to process Water & Environmental loan and grant applications. The data entered in this system includes all data required for completion of forms needed to process the obligation of the loan/grant. Data is entered on the Client CPAP program and is stored on a SQL Server in the Web Farm. The data is used on the Client program primarily to print forms. Each night the data is also transferred to the Data Warehouse for reporting.</p>
<p>2a. What are the sources of the information in the system?</p>	<p>The Program Staff, Deputy Chief Financial Officer, and General Field Representatives, and State and District offices users enter data.</p>
<p>2b. What USDA files and databases are used? What is the source agency?</p>	<p>The SRRS database, the CPAP database, and the FOMF file are used. The source agency is Rural Development.</p>
<p>2c. What Federal Agencies are providing data for use in the system?</p>	<p>USDA- Rural Development-Rural Utilities Service and the United States Treasury</p>
<p>2d. What State and Local Agencies are providing data for use in the system?</p>	<p>No state or local agencies provide data.</p>
<p>2e. From what other third party sources will data be collected?</p>	<p>Capital Advantage lists Congressional District information. NIST provides standard place names and numbers. Mellon Bank Cooperative Finance Corp.</p>

	provides collection data.
2f. What information will be collected from the customer/employee?	Information included contains Taxpayer Identification (ID) Numbers, debt payment information, addresses, and Board of Director contact information.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	IRM Staff will periodically query the data in the system through standard reports to audit the operation of interfaces that provide data other than from USDA or the customer.
3b. How will data be checked for completeness?	See 3a.

ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	USDA RD RULSS system users and managers and RULSS Systems Administrators.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	RULSS 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.
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>Users are uniquely identified with a user ID. The system maintains the identity of the user and links allowable actions to specific users. The maintenance of user ID's will be accomplished using the administrative function.</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?	<p>System log files are created by DB2 and Websphere which log actions being taken by the database and application servers. RULSS log files are also created which include transaction history and an event file.</p> <p>Audit trails are designed and implemented to record appropriate information that can assist in intrusion detection. The audit trails include sufficient information to determine the type of event, when it occurred, the user ID associated with the event, and the command/program used to initiate the event. Access to these logs is restricted to the system administrators.</p>
5a. Do other systems share data or have access to data in this system? If yes,	RULSS and CPAP are accessible only by authorized users on the USDA Intranet. There is not direct

explain.	access to data from system to system. Files are sent back and forth through a FTP server in the Web Farm or data is passed back and forth through a messaging que (MQ Series) box.
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	Greg Eschman Branch Chief Rural Business-Cooperative Services Branch 1520 Market Street St. Louis, Missouri 63103 Phone Number: 314-335-8503 E-mail: ge167@stl.rural.usda.gov
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	No other agencies share data or have direct access to data in this system.
6b. How will the data be used by the agency?	RULSS provides a complete program management and financial information system. Data will be used to maintain accountability and provide authorization for advancing approved Rural Electric and Telephone funds, Rural Telephone Bank (RTB) funds, and Federal Finance Bank (FFB) funds to borrowers (customers).
6c. Who is responsible for assuring proper use of the data?	Greg Eschman Branch Chief Rural Business-Cooperative Services Branch 1520 Market Street St. Louis, Missouri 63103 Phone Number: 314-335-8503 E-mail: ge167@stl.rural.usda.gov

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 program management and financial information.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	The system does not derive new data. The system is an automated means, to provide (create) all-in-one location of previously unavailable data, which was in the past available mostly by manual processes or legacy systems.
2b. Will the new data be placed in the individual's record (customer or employee)?	Yes, the data will be stored by borrower record/ borrower identification.
2c. Can the system make determinations about customers or employees that would	Yes, the system will provide complete program

not be possible without the new data?	management and financial information.
2d. How will the new data be verified for relevance and accuracy?	The data will be verified through system screen edits and validations.
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	<p>The data itself is not being consolidated; the data is being consolidated all into one location.</p> <p>Users are uniquely identified with a user ID. The system maintains the identity of the user and links allowable actions to specific users. The maintenance of user ID's will be accomplished using the administrative function.</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>
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 authorized system users who and data is retrieved by Borrower IDs using search engines.
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.	There are no effects on the due process rights.
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.	RULSS is used for program management and financial information. There is no subjectivity or decision making based on an individual customer or employee by the RULSS or CPAP system(s).
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 hosted through the USDA Web Farm and the applications are restricted to authorized computers. Access is through user terminals which are on the system.
2b. Explain any possibility of disparate treatment of individuals or groups.	RULSS is used for program management and financial information. There is no subjectivity or decision making based on an individual customer or employee by the RULSS or CPAP system(s).
2c. What are the retention periods of data	Data is kept indefinitely.

in this system?	
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	See 2c.
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?	Periodic mailing of questionnaires and data updates through established interfaces ensure the data is timely and accurate.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	No, the system is not using technologies in ways that the USDA has not previously employed.
3b. How does the use of this technology affect customer/employee privacy?	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.
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	Users are uniquely identified with a user ID and password. The system maintains the identity of the user and links allowable actions to specific users.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No, users are uniquely identified with a user ID.
4c. What controls will be used to prevent unauthorized monitoring?	<p><u>RULSS:</u> RULSS users interact with RULSS applications via a web browser on their desktop PC. These browser-based desktops are currently within the USDA Intranet. RULSS server computers are Linux-based multi-CPU servers located within the secured WebFarm, behind a USDA firewall. Communication between user-activated browsers and the RULSS servers uses HTTP, the web protocol that communicates using TCP/IP, the Internet protocol, connecting to Internet Protocol (IP) ports reserved for web apps.</p> <p>Both the RULSS database server and the RULSS application servers are within the WebFarm firewall on a common subnet, simplifying security issues when RULSS applications access the database.</p> <p><u>CPAP:</u> All users uniquely identified. The system internally maintains the identity of all active users and links actions to specific users. All User IDs belong to currently authorized users. Identification data is kept</p>

	<p>current by adding new users and deleting former users. User ID's that are inactive on the system for a specific period of time are not disabled</p> <p>As a major application authentication control mechanism, users login with a unique User ID and Password. The method of user authentication is password.</p>
<p>5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.</p>	<p>RULSS operates under SOR USDA/RURAL DEVELOPMENT RD -1, System name: Applicant, Borrower, Grantee, or Tenant File.</p>
<p>5b. If the system is being modified, will the SOR require amendment or revision? Explain.</p>	<p>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.</p>