



**Privacy Impact Assessment
(PIA)
Farm Loan Programs Risk Assessment
(FLPRA)**

Revision: *Final*

Farm Service Agency

Date: *August 10, 2010*





Privacy Impact Assessment for
Farm Loan Programs Risk Assessment (FLPRA)



Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.0	May 18, 2010	Anita Trader, ISO DR	Initial version.
1.01	August 8, 2010	Judy Sobbing, ECS	Updated from Privacy Officer prior comments, baseline and email dated 8/5 from technical contact (system support).
1.02	August 11, 2010	Elizabeth Segura, FSA	Verified document contents, made several edits for clarification.
1.03	09/09/2010	R. Barbee, ECS	Attached signature page to finalize document.



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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 **Farm Loan Programs Risk Assessment** 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:	Farm Loan Programs Risk Assessment (FLPRA).
System Type:	<input type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input checked="" type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> Low
Description of System:	<p>Farm Loan Programs Risk Assessment (FLPRA) is the automated National and State internal audit process for Farm Loan Programs. FLPRA compiles data and produces reports to assist in the evaluation process by providing FSA with a clear, concise, objective evaluation of the overall condition and performance of the State FLP. The FLPRA reports and review work establishes the basis for actions taken by FSA to ensure that State Farm Loan Programs are effective and comply with regulations.</p>
Who owns this system? (Name, agency, contact information)	<p>Pam Polson USDA/FSA/FCAO 6500 Beacon Drive Kansas City, MO 64133 (816) 926-2633 pam.polson@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) USDA/FSA/ITSD/ISO 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>Elizabeth Segura USDA/FSA/FCAO 6500 Beacon Drive Kansas City, MO 64133 (816) 926-2702 elizabeth.segura@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.	Customer and Farm Loan Program data (FLP data for State and Service Centers) including name and Social Security Number for association for test data used in summarizing test results for calculating effectiveness of FLP programs by State and Service Centers.
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.	The Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397.
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.	PLAS, FBP, DLS, and GLS applications. MRT Common Business Services.
4.1	What data is being collected from the customer?	None.
4.2	What USDA agencies are providing data for use in the system?	FSA (National, State, and County Offices).
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?	None.
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 type="checkbox"/> Yes <input checked="" 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?	N/A. Note: FLPRA uses customer data that has been previously collected through other approved applications.



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No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A.

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?	For reference to substantiate summary numbers used in calculations for reporting effectiveness of FSA Farm Loan Programs.
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?	N/A.
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 type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Yes <input checked="" 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?	N/A.
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?	To formulate summary data to calculate effectiveness of FSA Farm Loan Programs.



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No.	Question	Response
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?	N/A.
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?	User ID and passwords for application and database. Access rights are managed through role-based security restrictions. (USDA eAuthentication Application and FSA Extensible Authorization System for the web application and SQL internal RDBMS security module for the FLPRA Database) Dedicated or secure file transfer. Network firewalls and monitoring.
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" 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 passwords for application and database. Access rights are managed through role-based security restrictions. (USDA eAuthentication Application and FSA Extensible Authorization System for the web application and SQL internal RDBMS security module for the FLPRA Database) Dedicated or secure file transfer. Network firewalls and monitoring.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" 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?	N/A.



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No.	Question	Response
14.2	What are the procedures for purging the data at the end of the retention period?	N/A.
14.3	Where are these procedures documented?	N/A.
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?	Fairness in making determinations is assured because policy requires that the information be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.
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?	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 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?	Administrative controls and procedures are established to maintain consistent system use.

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.)?	National and State Office Personnel, and developers.



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No.	Question	Response
21	How will user access to the data be determined?	Access for National and State Office personnel must be requested through the on-line eAuthentication registration process. Developer access must be facilitated through FSA security.
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?	By unique user ID and password. Users may also be restricted by location and roles.
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.)?	FSA Privacy Act Officer/FSA PII Officer.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	FSA National Help Desk at (800)-255-2434 or the Centralized Help Desk at 800-457-3642 or By contacting John W. Underwood, Privacy Officer, at FSA Privacy Act Officer / FSA PII Officer USDA - Farm Service Agency Beacon Facility - Mail Stop 8388 9240 Troost Avenue Kansas City, Missouri 64131-3055 Phone: 816-926-6992 Cell: 816-564-8950 Fax: 816-448-5833 mailto:john.underwood@kcc.usda.gov
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. <input type="checkbox"/> No



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No.	Question	Response
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	N/A.
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?	N/A.
28	How will the system and its use ensure equitable treatment of customers?	By providing a centralized and standardized method of processing the information within the system.
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	N/A.



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.)?	Social Security 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). USDA/FSA-14, Applicant/Borrower.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" 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?	N/A.



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.



Privacy Impact Assessment Authorization Memorandum

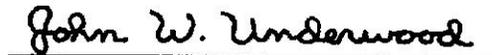
I have carefully assessed the Privacy Impact Assessment for the
Farm Loan Programs Risk Assessment

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.


Pam Polson, Information System Owner

08-31-2010
Date


John Underwood, Chief Privacy Officer

9/8/10
Date


James Gwinn, FSA CIO

9/9/2010
Date