



Privacy Impact Assessment (PIA)

**Noninsured Crop Disaster Assistance Program
(NAP)
Approved Yields (AY)**

Revision: *Final*



Farm Service Agency

Date: *May 27, 2010*



Document Information

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|------------------------|--|
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| Document Revision and History | | | |
|-------------------------------|--------------|----------------------|---|
| Revision | Date | Author | Comments |
| 1.01 | May 17, 2010 | Anita Trader, ISO DR | Initial version. |
| | May 27, 2010 | S. Timbrook, ECS | Initial review updated from baseline, release to system owner for final review. |
| | 6/18/20 10 | R. Barbee, ECS | Attached signature page to finalize document for FY10. |



Table of Contents

Approved Yields (AY)ii

1 PURPOSE OF DOCUMENT 1

2 SYSTEM INFORMATION 2

3 DATA INFORMATION 3

3.1 Data Collection 3

3.2 Data Use 4

3.3 Data Retention..... 6

3.4 Data Sharing 6

3.5 Data Access 7

3.6 Customer Protection..... 7

4 SYSTEM OF RECORD 9

5 TECHNOLOGY 10

6 COMPLETION INSTRUCTIONS 11



1 Purpose of Document

USDA DM 35 15-002 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 **Noninsured Crop Disaster Assistance Program Approved Yields-Approved Yields (AY)** 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

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| e |
| Yield |
| at ort Syst pplica |
| |
| s also known as Approved Production History (APH). This system will compute a current year yield based on production factors and available data. Approved yields are based on APH yield, which can include actual yields, replacement yields, zero credited yields, substitute yields, and any other yields. The number of yearly yields in the database. A minimum of one and up to ten years of these types of yields must exist in the database. |
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| m Security Program Manager (IS SP) of Agricult e ce Avenue . 20 c.usda |
| k from Baseline and prior years PIA documents. |

System Information



3 Data Information

3.1 Data Collection

| No. | Question | Response |
|-----|---|---|
| 1 | Generally describe the data to be used in the system. | Producer data is used in association with crop/livestock production/loss information to determine payments by disaster system. Specifically, a producer's ID, ID type, entity type, name, and address, as well as any associated producer's information are used as identifying information. |
| 2 | Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)? | Yes 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. | Yes No |
| 4 | Sources of the data in the system. | Name and address and crop/livestock files are the main sources of information, as well as information gathered from the producers themselves. Farm records and subsidiary files are used in making payments to the customers. |
| 4.1 | What data is being collected from the customer? | A producer's/customer's tax ID, ID type, and entity type, as well as any associated producers information is used as key data in these systems. The customer provides either their name or tax ID to initiate a transaction, and from there may go on to provide crop, commodity, and/or livestock information, as well as associated production and/or loss information. Customer provided crop data includes crop, crop type, irrigation practice, intended use, planting period, production data, etc. |
| 4.2 | What USDA agencies are providing data for use in the system? | Farm Service Agency. |



| No. | Question | Response |
|-----|--|---|
| 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. | Yes No – If NO, go to question 6. |
| 5.1 | How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness? | Data collected from customers is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made. |
| 5.2 | How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness? | Data collected from USDA sources is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made. |
| 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? | To provide financial assistance to producers of non-insurable crops when low yields, loss of inventory or prevented planting occurs due to natural disasters. |
| 7 | Will the data be used for any other purpose? | Yes 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 | Yes No |



Privacy Impact Assessment for Noninsured Crop
Disaster Assistance Program (NAP)
Approved Yields (AY)



| No. | Question | Response |
|------|---|---|
| 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.)? | Yes No – If NO, go to question 10. |
| 9.1 | Will the new data be placed in the individual’s record (customer or employee)? | Yes s |
| 9.2 | Can the system make determinations about customers or employees that would not be possible without the new data? | Yes s No |
| 9.3 | How will the new data be verified for relevance and accuracy? | Only employees input data, and the data is validated per system requirements and other documents such as system handbooks. Spot checks are also routinely performed to ensure reported production and loss information is accurate. |
| 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 provide financial assistance to producers of non-insurable crops when low yields, loss of inventory or prevented planting occurs due to natural disasters. |
| 11 | Will the data be used for any other uses (routine or otherwise)? | Yes 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? | Yes No – If NO, go to question 13. |
| 12.1 | What controls are in place to protect the data and prevent unauthorized access? | Unauthorized access is prevented via mainframe controls. For web-based systems, roles are assigned and information retrieval is limited based on those roles. |
| 13 | Are processes being consolidated? | Yes No – If NO, go to question 14. |



| No. | Question | Response |
|------|---|----------|
| 13.1 | What controls are in place to protect the data and prevent unauthorized access? | N/A. |

3.3 Data Retention

| No. | Question | Response |
|------|---|--|
| 14 | Is the data periodically purged from the system? | Yes 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. |
| 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? | Validation checks and access controls are done during processing to ensure that the integrity of the data is not corrupted. Data backups are created frequently to ensure data integrity in the event of loss or failure of the system. In addition, OIG performs random audits to ensure data and system integrity. |
| 16 | Is the data retained in the system the minimum necessary for the proper performance of a documented agency function? | Yes 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.)? | Yes 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? | Yes 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. |



| No. | Question | Response |
|------|--|---|
| 19 | Is the system operated in more than one site? | Yes 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.)? | County, State, and National Office FSA users, as well as developers, testing, and help desk employees have access to the data in the system. |
| 21 | How will user access to the data be determined? | Access must be requested through FSA- 1 3A security forms with justification. |
| 21.1 | Are criteria, procedures, controls, and responsibilities regarding user access documented? | Yes s No |
| 22 | How will user access to the data be restricted? | Users are restricted through role-based security within the application. Once access has been properly granted, there are no restrictions to viewing the data. Update capabilities are restricted by User ID. |
| 22.1 | Are procedures in place to detect or deter browsing or unauthorized user access? | Yes s |
| 23 | Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)? | Yes s 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. |



Privacy Impact Assessment for Noninsured Crop
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Approved Yields (AY)



| No. | Question | Response |
|------|---|---|
| 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? | Yes – If YES, go to question 27. Common FSA incident reporting process. No |
| 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)? | Yes 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? | These systems contain no identifying information such as race, religion, gender, national origin, and age. However, by statute, these systems can determine whether or not a producer is eligible for benefits (payments) based on program parameters. |
| 29 | Is there any possibility of treating customers or employees differently based upon their individual or group characteristics? | Yes 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? | Yes 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.)? | Data can be retrieved by producer/customer name and tax ID. |
| 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? | Yes |



5 Technology

| No. | Question | Response |
|------|---|---|
| 31 | Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)? | Yes 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-1 1, 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
Noninsured Assistance Program Approved Yields

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.


Jennifer Thomas, Information System Owner
Date 6.10.10


John Underwood, Chief Privacy Officer
Date 6/14/10


James Gwinn, FSA CIO
Date 6/17/2010