Privacy Impact Assessment (PIA)

Consolidated Management System (CMS)

Contract Management System

Revision: Final

Farm Service Agency

Date: June 22, 2010

Document Information

Business Owner Details	
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Document Revision and History			
Revision	**Date**	**Author**	**Comments**
1.01	May 17, 2010	Anita Trader, ISO DR	Initial version for 2010 copied from 2009 CMS PIA
	June 2, 2010	S. Timbrook, ECS	Updated system description, released for signatures.
	June 22, 2010	C. Niffen	Made changes per John Underwood Questions 4, 4.2, 4.4, 5.3, 13.1, 30.2
Final	June 22, 2010	R. Barbee, ECS	Attached signature page to finalize the 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 **Consolidated Management System (CMS) - Contract Management System** 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:	Consolidated Management System (CMS) - Contract Management System.
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	CMS is a component that is used in the development of solicitations for aerial photography, the evaluation of bids, selection of the most qualified bidder, monitoring, and management of contracts, contract performance, and procedural updates. The CMS application is used in the development of solicitations for aerial photography, the evaluation of bids, selection of most qualified bidder, monitoring and management of contracts, contract performance, and procedural updates.
Who owns this system? (Name, agency, contact information)	Lori Uhlhorn USDA-FSA Aerial Photography Field Office 2222 West 2300 South – 1st Floor Salt Lake City, UT 84119-2020 801-844-2970 Lori.Uhlhorn@slc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov

Who completed this document? (Name, agency, contact information)	Lori Uhlhorn USDA-FSA Aerial Photography Field Office 2222 West 2300 South – 1st Floor Salt Lake City, UT 84119-2020 801-844-2970 Lori.Uhlhorn@slc.usda.gov

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Request for Proposal, Quote, Proposal, Purchase Order Information, Imagery Inspection Data, and Contractual Findings.
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.	All APFO, Commercial and private customers, NOAA, FEMA, DHS, external Federal
4.1	What data is being collected from the customer?	The customer's shipping address, email address, fax, phone and preferred payment method. Contract proposals.
4.2	What USDA agencies are providing data for use in the system?	APFO
4.3	What state and local agencies are providing data for use in the system?	None.

No.	Question	Response
4.4	From what other third party sources is data being collected?	Commercial and private customers, NOAA, FEMA, DHS, external Federal
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 by APFO personnel 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?	Data collected from non-USDA/third party 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

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?	APFO's geospatial data is used for emergency planning, disaster response, census, agriculture, event security.
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

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 ☒ No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes ☒ No
9.3	How will the new data be verified for relevance and accuracy?	SSN numbers are collected only on those individuals requesting a cash refund. New data is verified for relevance and accuracy by the customer and employee upon entry of the data into the system.
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?	APFO's geospatial data is used for emergency planning, disaster response, census, agriculture, event security.
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?	The data is consolidated by design. Centralized Oracle relational database instance with authentication methods are being employed. Permissions are set within the database structure to keep unauthorized queries and programs from accessing data.
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?	The data is consolidated by design. Centralized Oracle relational database instance with authentication methods are being employed. Permissions are set within the database structure to keep unauthorized queries and programs from accessing data.

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?	Contracting data is maintained for 6 years. All other data is retained indefinitely.
14.2	What are the procedures for purging the data at the end of the retention period?	Manual processes exist for archiving the data off-site for the six-year financial data requirement. At the end of the retention requirement the media is destroyed using a DOD grade degausser.
14.3	Where are these procedures documented?	Federal Acquisition Register – Sub Part 4.7- Contractor Records Retention
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?	☒ 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?	Geospatial data produced by APFO during this process is in the Public Domain.

No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	Geospatial data produced by APFO during this process is in the Public Domain. APFO assures thru roles and ACL's that requestors are restricted to read only.
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.
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?	N/A.

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.)?	All APFO Personnel, Developers, DBA's, SA's, external Federal, Commercial and Private Customers.
21	How will user access to the data be determined?	Access is determined by the user's position within APFO and controlled via role-based authentication. This access is documented within the administrator's manual. Access by external customers is managed thru ACL's and new accounts are approved by IT Manager prior to creation. Direct Access to data is restricted via ACL's and configured thru server services as opposed direct access from user's accounts. When a request for data is made, the system creates "pseudo links" where the data can be downloaded.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☒ Yes ☐ No
22	How will user access to the data be restricted?	Read only access is granted to all APFO employees and customers.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes ☐ No

No.	Question	Response
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☒ Yes ☐ 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?	☒ Yes – If YES, go to question 27. ☐ 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.

No.	Question	Response
28	How will the system and its use ensure equitable treatment of customers?	By providing a standardized method of performing APFO's geospatial data that is used for emergency planning, disaster response, census, agriculture, event security.
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.)?	Primary access to the system is through the Exceed Corporation's Hummingbird terminal emulation program, which allows a menu driven application interface. The menu was developed using the following Oracle applications, SQL Report Writer, and SQL Forms, as the front-end interface with the Oracle RDBMS. PDS system is controlled, administered, and maintained by APFO.
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) and USDA/FSA–3 - Consultants File
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes ☒ No

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-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

Consolidated Management System (CMS)- Contract Management System

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.

Lori J. Uhlhorn, Information System Owner — Date: 15 June 2010

John W. Underwood — 6/17/10

John Underwood, Chief Privacy Officer — Date

for — 6/22/2010

James Gwinn, FSA CIO — Date