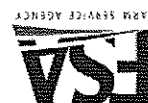


Date: September 09, 2009

Farm Service Agency



Revision: Final

Receivables System (RM)  
National Receipts and Receivables System (NRRS)

# Privacy Impact Assessment (PIA)





## Document Information

Owner Details	
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Document Revision and History			
Revision	Date	Author	Comments
Draft	07/29/2009	S. Timbrook, ECS	Original document
	07/31/2009	Patricia Bryant, AFAO	
Draft V1	08/07/2009	S. Timbrook, ECS	Reviewed and returned for update pertaining to NRRS system.
	08/10/2009	Jeffrey O'Connell	Update document to reflect NRRS system.
Final	08/14/2009	S. Timbrook, ECS	Reviewed and accepted changes per SN. Marked Final, returned for signatures.
	09/09/2009	S. Timbrook, ECS	Change name of System from Debt to Receivables returned for signatures.



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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 **Receivables Systems (RM), National Receipts and Receivables System (NRRS)** 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:	<p><b>Receivables System (RM)</b></p> <p><b>National Receipts and Receivables System (NRRS)</b></p> <p>(Note: CRS, CCDB &amp; ACS will be phased out with the implementation of NRRS. ACAS &amp; ACAS notes will be phased out with subsequent NRRS software updates)</p>
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p><b>National Receipts and Receivables System (NRRS)</b> is a web-based accounting application for real-time processing and display of receivables. It will act as an intermediary between source systems for receivable records, and the accounting system or general ledger. A receivable is generated by National Payments System (NPS) and sent to NRRS. A receivable is composed of multiple sub-balances, each of which is individually transmitted to the CORE Accounting System. NRRS will generate Debt Due Process Demand letters to customers associated with a receivable and records the receipt of monies that have been collected to satisfy a receivable. NRRS has been designed to replace the functionality currently existing on the S/36 system within Common Receivable System (CRS), Automated Claims System (ACS), and the Cash Receipts System Center S/36 as well as the Central claims database mainframe application.</p>
Who owns this system? (Name, agency, contact information)	<p>Darrel Davis            Chief, Receivable Management Office (RMO)            U.S. Department of Agriculture            Farm Service Agency            6501 Beacon Drive, Mail Stop 8568            Kansas City, MO. 64133-4676            (816) 926-2554  <a href="mailto:darrel.davis@kcc.usda.gov">darrel.davis@kcc.usda.gov</a></p>



Who is the security contact for this system? (Name, agency, contact information)	<p>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 <a href="mailto:brian.davies@wdc.usda.gov">brian.davies@wdc.usda.gov</a></p>
Who completed this document? (Name, agency, contact information)	<p>Jeffrey O'Connell Systems Accountant, Receivable Management Office (RMO) U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive, Mail Stop 8568 Kansas City, MO. 64133-4676 (816) 823-1447 <a href="mailto:jeffrey.oconnell@kcc.usda.gov">jeffrey.oconnell@kcc.usda.gov</a></p>

### 3 Data Information

#### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>Employees: Debt, Debtor and Treasury Referral Information, Customer: Name, address, TIN/SSN and debt information.</p>
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.</p>
2.1	State the law or regulation that requires the collection of this information.	<p>The Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397</p>
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.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>



No.	Question	Response
4	Sources of the data in the system.	Central Claims Database information, information provided by customer, SCIMS, Automated Claims System at the field offices, Program applications and customer provided information
4.1	What data is being collected from the customer?	Producer status and Treasury referral status, Customer: Name, address, TIN/SSN and debt information, name and address
4.2	What USDA agencies are providing data for use in the system?	AMS, FNS,
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?	Cotton Cooperatives and Peanut Marketing Association
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 checked="" type="checkbox"/> Yes <input 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?	We will follow the handbooks for processing the transactions, 3-FI, 64-FI (in draft), 55-FI & 58-FI. Standard operating procedures will be developed from the handbooks once deployment and software updates are finalized.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	System edits and validations. The County Office & KC support staff will review and update the data to customer service
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	data from credit support vendors will be used to verify financial statement information provided by customers.

### 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 service debt. This is required by the Debt compliance Improvement Act (DCIA) of 1996 and CFR Part 3 also applies.
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?	



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No.	Question	Response
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 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 type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	
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?	Debt servicing.
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?	
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?	Security encryption and complex password authentication processes.
13	Are processes being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	Web-based security restrictions.

### 3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input 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?	Data is retained for the life of the debt. Receivable can be archived after achieving a zero-balance and having no activity for 16 months. All receivable and collection information will be archived at the same time to ensure data integrity.
14.2	What are the procedures for purging the data at the end of the retention period?	Procedures for purging information will be outlined in 64-FI.
14.3	Where are these procedures documented?	Procedures for purging information will be outlined in 64-FI.
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?	Procedures for maintaining data are outlined in 64-FI.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	Debt Data Mart and National Payment Service are given information gleaned from ACAS. For NRRS, the Department of Treasury will use the information to offset federal payments, wage garnishment, and referral to collection agencies. Also, the information is used to report delinquent debt for the purposes of creditworthiness. Commercial Credit Bureaus are supplied delinquent debt status via encrypted e-mail attachment.



No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	County Executive Directors, system owners and all authorized personnel for which access to the system is granted.
18	Is the data transmitted to another agency or an independent site?	<input checked="" type="checkbox"/> Yes <input 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?	Memorandum of Understanding with the credit bureaus (this came from the CCDB prior to NRRS).
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes (It is web-based) <input checked="" 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?	

### 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.)?	Users, managers, System Administrators, developers, and others
21	How will user access to the data be determined?	Access must be requested through FSA-13A security forms with justification.
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?	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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NRRS- Access is based on login ID (e-auth). Browsing and unauthorized use is prevented based on this discretionary access control process.
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.)?	Production Adjustment and Risk Management Office and John W. Underwood, 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 John W. Underwood 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: 816-564-8938 Fax: 816-448-5833 <a href="mailto:john.underwood@kcc.usda.gov">mailto:john.underwood@kcc.usda.gov</a>
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
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
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?	
28	How will the system and its use ensure equitable treatment of customers?	By providing a centralized and standardized method of making payment transactions
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	



## 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.)?	can be retrieved by tax identification number (TIN/SSN). NRRS will display the customer's Tax Id on screens where appropriate and reports will print only the last 4 digits of the tax ID numbers.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)	USDA/FSA-13 – Claims Data Base, August 20, 2009
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 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?	



## 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.



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**Privacy Impact Assessment Authorization  
Memorandum**

I have carefully assessed the Privacy Impact Assessment for the

**Receivables System (RM)**

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.

*Darrel Davis*

Darrel Davis, Chief, Receivable Management Office (RMO)  
System Manager/Owner

*09/18/2009*  
Date

*John W. Underwood*

John W. Underwood  
FSA Privacy Act Officer

*9/18/09*  
Date

*Jim Gwinn*

Jim Gwinn  
Agency CIO

*10/15/09*  
Date