



**Privacy Impact Assessment
(PIA)
Facility Loans Systems
(FLS)**

Revision: *Final*

Farm Service Agency

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Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	May 24, 2010	Judy Sobbing, ESC	Review and update FY2010 SSFL PIA
Final	June 29, 2010	S. Timbrook, ECS	Marked Final, added signatures



Privacy Impact Assessment for
Facility Loans System (FLS)



**Privacy Impact Assessment Authorization
Memorandum**

I have carefully assessed the Privacy Impact Assessment for the
Facility Loans Systems (FLS)

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.



Tonye Gross, Information System Owner Date 6-23-10



John Underwood, Chief Privacy Officer Date 6/25/10



James Cwinn, FSA CIO Date 6/29/2010

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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 **Facility Loans Systems, Sugar Storage Facility Loans** 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

System Information	
Agency:	Farm Service Agency.
System Name:	Facility Loans Systems (FLS).
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	The Facility Loans System (FL S) application/system was developed to support the lending of funds for building storage and handling facilities for various commodities such as grains and sugar
Who owns this system? (Name, agency, contact information)	Tonye Gross USDA/FSA/PSD 1400 Independence Ave. SW 4704-S Washington D.C., 20250 (202) 720-4319 tonve.gross@wdc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (IS SPM) USDA/FSA/ITSD/ISO 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)	Teresa McGiverin USDA/FSA/PSCAO 6501 Beacon Drive Kansas City, MO 64133 (816) 926-6786 teresa.mcgiverin@kcc.usda.gov

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer – Farm records and ID numbers.
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 s No
4	Sources of the data in the system.	Name and Address File, Farm Records File, and Eligibility File.
4.1	What data is being collected from the customer?	Information concerning customer repayment ability.
4.2	What USDA agencies are providing data for use in the system?	FSA.
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?	Credit Bureaus. Secretary of State – Lien Filing. Federal Bankruptcy Court – Chapter 7, 11 and 12 filing notification.
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.

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No.	Question	Response
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?	Data collected from non-USDA sources (i.e. lien filings, bankruptcy filings, and credit reports) 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?	The FLS system will track key application information, application status, and disbursement data to support the administration of storage facility loans for grain and sugar products.
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 s 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.)?	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

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No.	Question	Response
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?	The customer and FSA Service Center personnel verify data upon entry for relevance and accuracy. Subsequent reviews are performed by management including the responsible FSA State Office.
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?	The data will be used to allow the program to provide and administer loans to eligible parties and producers for storage facilities needed to store grains and sugar products.
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 OS/400 and SSP operating system security modules provide identification and authentication (passwords) along with Authorization controls (discretionary access). ACF2 security software provides identification, authentication and authorization roles for information uploaded to the mainframe or information for downloading to FLS system. ITS telecommunication provides firewall rules to protect the network the FLS system resides on.
13	Are processes being consolidated?	Yes No – If NO, go to question 14.

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No.	Question	Response
13.1	What controls are in place to protect the data and prevent unauthorized access?	<p>The OS/400 and SSP operating system security modules provide identification and authentication (passwords) along with Authorization controls (discretionary access) for local service center records.</p> <p>Windows Active Directory provides Identification, Authentication and Authorization to the process (CTCS-BCS system) which consolidates FSA service center files for uploading to the mainframe or breaking-out files for uploading to the FLS system at service centers. ACF2 security software provides identification, authentication and authorization controls for files being uploaded or downloaded to services centers while stored on the mainframe.</p>

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<p>Yes</p> <p>No – If NO, go to question 15.</p>
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?	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?	<p>Ye</p> <p>s</p> <p>No</p>

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.
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.)?	FSA Service Center (County Offices) staff has access to maintain the data while FSA State and National office personnel have access to review the data.
21	How will user access to the data be determined?	Access to the data is determined by FSA Office location codes (i.e., County, State, and National users).
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes s No

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No.	Question	Response
22	How will user access to the data be restricted?	Each local service center can access only those records stored on their local AS/400 S 36 infrastructure. State users are restricted to inquire only on information for loans within their respective state, while National users can inquire on all facility loans.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes
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.

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No.	Question	Response
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?	By providing a centralized and standardized method of making program decisions.
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

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.)?	By authorized employees using Tax Identification 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 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?	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.