Privacy Impact Assessment (PIA)
Natural Disaster Relief (NDR)
Livestock Compensation Program (LCP II)

Revision: 1.01

Farm Service Agency
Date: May 28, 2010
### Document Information

<table>
<thead>
<tr>
<th>Business Owner Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name</strong></td>
</tr>
<tr>
<td><strong>Contact Number</strong></td>
</tr>
<tr>
<td><strong>E-mail Address</strong></td>
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</tbody>
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<tr>
<th>Document Revision and History</th>
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<tbody>
<tr>
<td><strong>Revision</strong></td>
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<td>1.01</td>
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Privacy Impact Assessment for
Livestock Compensation Program (LCP II)

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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 NDR-Livestock Compensation Program (LCP II) 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

<table>
<thead>
<tr>
<th>Agency:</th>
<th>Farm Service Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>System Name:</td>
<td>NDR-Livestock Compensation Program (LCP II)</td>
</tr>
<tr>
<td>System Type:</td>
<td>Major Application</td>
</tr>
<tr>
<td></td>
<td>General Support System</td>
</tr>
<tr>
<td></td>
<td>Non-major Application</td>
</tr>
<tr>
<td>System Categorization (per FIPS 199):</td>
<td>High</td>
</tr>
<tr>
<td></td>
<td>Moderate</td>
</tr>
<tr>
<td></td>
<td>Low</td>
</tr>
<tr>
<td>Description of System:</td>
<td>Livestock Compensation Program (LCPII) This program provides monetary assistance to eligible livestock owners and cash lessees, but not both for the same livestock, for certain types of livestock for feed losses that occurred as a result of a designated HRP hurricane. Eligible HDP 2005 Hurricanes include Dennis, Katrina, Rita, Wilma, and Ophelia. Wilma significantly impacted the Gulf Coast region and Hurricane Ophelia impacted North Carolina in 2005. Because of the severity and widespread devastation, the Secretary has determined to use the authority under Section 32 of the Agriculture Adjustment Act of August 24, 1935, to implement 4 disaster programs to assist in re-establishing farmers’ purchasing power in these areas. Regulations governing these disaster programs can be found at 7 CFR Part 760, Subparts B through F.</td>
</tr>
</tbody>
</table>
| Who owns this system? (Name, agency, contact information) | Sandy Bryant  
FSA/DAFP/PECD/CPB  
Farm Service Agency  
1400 Independence Avenue SW. 4758-B  
Washington, D.C. 20250  
(202) 720-4380  
Sandy_Bryant@wdc.usda.gov |
Privacy Impact Assessment for Livestock Compensation Program (LCP II)

| Who is the security contact for this system? (Name, agency, 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 |
|---|---|
# 3 Data Information

## 3.1 Data Collection

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Generally describe the data to be used in the system.</td>
<td>Name, address, TIN/SSN, crop/livestock production/loss information, ID, ID type, entity type, name, any associated producer’s information are used as identifying information.</td>
</tr>
<tr>
<td>2</td>
<td>Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?</td>
<td>Yes</td>
</tr>
<tr>
<td>2.1</td>
<td>State the law or regulation that requires the collection of this information.</td>
<td>The Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397.</td>
</tr>
<tr>
<td>3</td>
<td>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.</td>
<td>Yes</td>
</tr>
<tr>
<td>4</td>
<td>Sources of the data in the system.</td>
<td>Producer’s, Customer Farm records and Farm Service Agency compliance and payment program guidance, Farm records and subsidiary files, information provided by customers, SCIMS.</td>
</tr>
<tr>
<td>4.1</td>
<td>What data is being collected from the customer?</td>
<td>A producer’s/customer’s tax ID, ID type, entity type, and any associated producers information is used as key data in these systems. Customer’s name or tax ID, crop, commodity, livestock information, production loss information, crop data, etc.</td>
</tr>
<tr>
<td>No.</td>
<td>Question</td>
<td>Response</td>
</tr>
<tr>
<td>-----</td>
<td>--------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>4.2</td>
<td>What USDA agencies are providing data for use in the system?</td>
<td>Risk Management Agency (RMA), Farm Service Agency (FSA)</td>
</tr>
<tr>
<td>4.3</td>
<td>What state and local agencies are providing data for use in the system?</td>
<td>State and County Service Centers</td>
</tr>
<tr>
<td>4.4</td>
<td>From what other third party sources is data being collected?</td>
<td>Risk Management Agency (RMA)</td>
</tr>
</tbody>
</table>
| 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 the customer 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 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

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>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?</td>
<td>Information is used to process eligible payments for individuals.</td>
</tr>
</tbody>
</table>
| 7   | Will the data be used for any other purpose?                             | Yes  
No – If NO, go to question 8.                                                                                     |
<p>| 7.1 | What are the other purposes?                                             | N/A                                                                                                                 |</p>
<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>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</td>
<td><strong>Yes</strong>&lt;br&gt;<strong>No</strong>&lt;br&gt;No – If NO, go to question 10.</td>
</tr>
<tr>
<td>9</td>
<td>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.)?</td>
<td><strong>Yes</strong>&lt;br&gt;No – If NO, go to question 10.</td>
</tr>
<tr>
<td>9.1</td>
<td>Will the new data be placed in the individual’s record (customer or employee)?</td>
<td><strong>Yes</strong>&lt;br&gt;<strong>No</strong></td>
</tr>
<tr>
<td>9.2</td>
<td>Can the system make determinations about customers or employees that would not be possible without the new data?</td>
<td><strong>Yes</strong>&lt;br&gt;<strong>No</strong></td>
</tr>
<tr>
<td>9.3</td>
<td>How will the new data be verified for relevance and accuracy?</td>
<td>New data is verified for relevance and accuracy by the customer and employee upon entry of the data into the system.</td>
</tr>
<tr>
<td>10</td>
<td>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?</td>
<td>Information is used to process eligible payments for individuals.</td>
</tr>
<tr>
<td>11</td>
<td>Will the data be used for any other uses (routine or otherwise)?</td>
<td><strong>Yes</strong>&lt;br&gt;No – If NO, go to question 12.</td>
</tr>
<tr>
<td>11.1</td>
<td>What are the other uses?</td>
<td>N/A</td>
</tr>
<tr>
<td>12</td>
<td>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?</td>
<td><strong>Yes</strong>&lt;br&gt;No – If NO, go to question 13.</td>
</tr>
<tr>
<td>12.1</td>
<td>What controls are in place to protect the data and prevent unauthorized access?</td>
<td>Data is internal to FSA employees. Security forms and eAuth/EAS privileges restrict unauthorized access to these systems/databases.</td>
</tr>
</tbody>
</table>
### Privacy Impact Assessment for Livestock Compensation Program (LCP II)

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Are processes being consolidated?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No – If NO, go to question 14.</td>
</tr>
<tr>
<td>13.1</td>
<td>What controls are in place to protect the data and prevent unauthorized access?</td>
<td>None</td>
</tr>
</tbody>
</table>

#### 3.3 Data Retention

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>Is the data periodically purged from the system?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No – If NO, go to question 15.</td>
</tr>
<tr>
<td>14.1</td>
<td>How long is the data retained whether it is on paper, electronic, in the system or in a backup?</td>
<td>Data is retained indefinitely. However, if data needs to be purged, possibly due to space limitations on the System/36, PECD makes that determination.</td>
</tr>
<tr>
<td>14.2</td>
<td>What are the procedures for purging the data at the end of the retention period?</td>
<td>PECD determines when and if data can or should be eliminated from our systems/databases. System/36 county data is consolidated thru CFU uploads and stored on the mainframe prior to purging data files from the county systems.</td>
</tr>
<tr>
<td>14.3</td>
<td>Where are these procedures documented?</td>
<td>Yes</td>
</tr>
<tr>
<td>15</td>
<td>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?</td>
<td>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.</td>
</tr>
<tr>
<td>16</td>
<td>Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
</tr>
</tbody>
</table>

#### 3.4 Data Sharing

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No – If NO, go to question 18.</td>
</tr>
<tr>
<td>17.1</td>
<td>How will the data be used by the other agency?</td>
<td>N/A</td>
</tr>
<tr>
<td>17.2</td>
<td>Who is responsible for assuring the other agency properly uses the data?</td>
<td>N/A</td>
</tr>
</tbody>
</table>
# Privacy Impact Assessment for Livestock Compensation Program (LCP II)

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td>Is the data transmitted to another agency or an independent site?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No – If NO, go to question 19.</td>
</tr>
<tr>
<td>18.1</td>
<td>Is there appropriate agreement in place to document the interconnection</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>and ensure the PII and/or Privacy Act data is appropriately protected?</td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Is the system operated in more than one site?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No – If NO, go to question 20.</td>
</tr>
<tr>
<td>19.1</td>
<td>How will consistent use of the system and data be maintained in all sites?</td>
<td>Administrative controls and procedures are established to maintain consistent system use.</td>
</tr>
</tbody>
</table>

## 3.5 Data Access

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>Who will have access to the data in the system (i.e., users, managers,</td>
<td>County, State, and National Office FSA users, as well as developers,</td>
</tr>
<tr>
<td></td>
<td>system administrators, developers, etc.)?</td>
<td>testing, and help desk employees have access to the data in the system.</td>
</tr>
<tr>
<td>21</td>
<td>How will user access to the data be determined?</td>
<td>Access must be requested through FSA-1 3A security forms with justification. Following standard agency procedures, job function and role are key factors in the granting access. Once approved, access is restricted by user ID and password.</td>
</tr>
<tr>
<td>21.1</td>
<td>Are criteria, procedures, controls, and responsibilities regarding user</td>
<td>Ye</td>
</tr>
<tr>
<td></td>
<td>access documented?</td>
<td>s</td>
</tr>
<tr>
<td></td>
<td></td>
<td>N</td>
</tr>
<tr>
<td>22</td>
<td>How will user access to the data be restricted?</td>
<td>By system security which requires that access be restricted by user ID and password.</td>
</tr>
<tr>
<td>22.1</td>
<td>Are procedures in place to detect or deter browsing or unauthorized user</td>
<td>Ye</td>
</tr>
<tr>
<td></td>
<td>access?</td>
<td>s</td>
</tr>
<tr>
<td>23</td>
<td>Does the system employ security controls to make information unusable to</td>
<td>Ye</td>
</tr>
<tr>
<td></td>
<td>unauthorized individuals (i.e., encryption, strong authentication procedures,</td>
<td>s</td>
</tr>
<tr>
<td></td>
<td>etc.)?</td>
<td>N</td>
</tr>
<tr>
<td></td>
<td></td>
<td>o</td>
</tr>
</tbody>
</table>

## 3.6 Customer Protection
<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>24</td>
<td>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.)?</td>
<td>Production Adjustment and Risk Management Office and USDA Privacy Office.</td>
</tr>
<tr>
<td>25</td>
<td>How can customers and employees contact the office or person responsible for protecting their privacy rights?</td>
<td>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 USDA - Farm Service Agency, 9240 Troost Avenue, Kansas City, Missouri 64131, Phone: 816-926-6992, Cell: 816-564-8950, Fax: 816-448-5833,<a href="mailto:john.underwood@kcc.usda.gov">mailto:john.underwood@kcc.usda.gov</a></td>
</tr>
<tr>
<td>26</td>
<td>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?</td>
<td>Yes – If YES, go to question 27. No</td>
</tr>
<tr>
<td>26.1</td>
<td>If NO, please enter the Plan of Action and Milestones (POA&amp;M) number with the estimated completion date.</td>
<td>N/A</td>
</tr>
<tr>
<td>27</td>
<td>Consider the following:</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Consolidation and linkage of files and systems</td>
<td>No – If NO, go to question 28.</td>
</tr>
<tr>
<td></td>
<td>Derivation of data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Accelerated information processing and decision making</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Use of new technologies</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?</td>
<td></td>
</tr>
<tr>
<td>27.1</td>
<td>Explain how this will be mitigated?</td>
<td>N/A</td>
</tr>
<tr>
<td>28</td>
<td>How will the system and its use ensure equitable treatment of customers?</td>
<td>FSA guidelines for fair and equitable treatment already exist. Automated consideration or uniform calculations of all available options.</td>
</tr>
<tr>
<td>29</td>
<td>Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No – If NO, go to question 30</td>
</tr>
<tr>
<td>29.1</td>
<td>Explain</td>
<td>N/A</td>
</tr>
</tbody>
</table>
## 4 System of Record

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>Can the data be retrieved by a personal identifier? In other words, does</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>the system actually retrieve data by the name of an individual or by</td>
<td>No – If NO, go to question 31</td>
</tr>
<tr>
<td></td>
<td>some other unique number, symbol, or identifying attribute of the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>individual?</td>
<td></td>
</tr>
<tr>
<td>30.1</td>
<td>How will the data be retrieved? In other words, what is the identifying</td>
<td>Producer Name, TIN/SSN, crop, and livestock information.</td>
</tr>
<tr>
<td></td>
<td>attribute (i.e., employee number, social security number, etc.)?</td>
<td></td>
</tr>
<tr>
<td>30.2</td>
<td>Under which Systems of Record (SOR) notice does the system operate?</td>
<td>USDA/FSA-2, Farm Records File (Automated).</td>
</tr>
<tr>
<td></td>
<td>Provide number, name and publication date. (SORs can be viewed at</td>
<td></td>
</tr>
<tr>
<td></td>
<td><a href="http://www.access.GPO.gov">www.access.GPO.gov</a></td>
<td></td>
</tr>
<tr>
<td>30.3</td>
<td>If the system is being modified, will the SOR require amendment or</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>revision?</td>
<td></td>
</tr>
</tbody>
</table>
### 5 Technology

<table>
<thead>
<tr>
<th>No.</th>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>31</td>
<td>Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No – If NO, the questionnaire is complete.</td>
</tr>
<tr>
<td>31.1</td>
<td>How does the use of this technology affect customer privacy?</td>
<td>N/A</td>
</tr>
</tbody>
</table>
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Livestock Compensation Program (LCP II)

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 8cis:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.