



**Privacy Impact Assessment
(PIA)
Program Loan Accounting System
(PLAS)**

Revision: 1.01



Farm Service Agency

Date: May 10, 2010



Privacy Impact Assessment for
Program Loan Accounting System (PLAS)



Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	May 10, 2010	Anita Trader, ISO DR	Initial version for 2010 populated from 2009 PIA and previous comments from Privacy Officer.

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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 **Program Loan Accounting System (PLAS)** 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*.

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2 System Information

System Information

System Information	
Agency:	Farm Service Agency
System Name:	Program Loan Accounting System (PLAS)
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	The Program Loan Accounting System (PLAS) is the accounting system of record and official reporting mechanism supporting more than 30 multi-billion dollar loan and grant programs for insured, direct and guaranteed loans.
Who owns this system? (Name, agency, contact information)	Mike Matthews USDA/F SA/FCAO 4300 Goodfellow Blvd. St. Louis MO 63120 (314) 539-7228 Todd.burke@kcc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) USDA/F SA/ITSD/ISO 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov

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Who completed this document? (Name, agency, contact information)	Judy Becker USDA/F SA/FCAO 4300 Goodfellow Blvd St. Louis, MO 63120 (314) 539-3489 Judy.becker@stl.usda.gov
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3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	PLAS uses customer Name, SSN, address, loan information, census type data and bank 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.	PLAS uses information from the customer, the State and County Office and SCOAP Farm Service Agency (FSA) Rural Development (RD) Treasury, NFC, HUD, IRS, Credit Checks,
4.1	What data is being collected from the customer?	Customer name, SSN, personal information, loan information, census type data and financial information
4.2	What USDA agencies are providing data for use in the system?	Farm Service Agency (FSA) Rural Development (RD) National Finance Center (NFC)
4.3	What state and local agencies are providing data for use in the system?	N/A
4.4	From what other third party sources is data being collected?	Treasury Internal Revenue Service (IRS) Dun & Bradstreet Experian HUD US Bank

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No.	Question	Response
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?	Standard Accounting Practice of Balancing, GAO Audit, FOI; Edit validations.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Standard Accounting Practice of Balancing, GAO Audit, FOI; Edit validations.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Standard Accounting Practice of Balancing, GAO Audit, FOI; Edit validations.

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 make loans and report on them
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?	
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
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	Yes s No

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No.	Question	Response
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?	To make loans and report on them
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?	
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?	User ID and passwords for application and database. Access rights are managed through role-based security restrictions. (CA Access Control Facility 2 –ACF2 for the mainframe and CA IDMS internal RDBMS security) Dedicated or secure file transfer. Network firewalls and monitoring.
13	Are processes being consolidated?	Yes No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	User ID and passwords for application and database. Access rights are managed through role-based security restrictions (CA Access Control Facility 2 –ACF2 for the mainframe and CA IDMS internal RDBMS security) Dedicated or secure file transfer. Network firewalls and monitoring.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	Yes No – If NO, go to question 15.

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No.	Question	Response
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
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. Rural Development, IRS, NFC, HUD, NRCS, OGC, DOJ, and Treasury
17.1	How will the data be used by the other agency?	As per MOU's
17.2	Who is responsible for assuring the other agency properly uses the data?	WDC FLP Program Staff, Program Accounting managers from FSA, and RD are responsible for assuring proper use of system data.
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?	Yes, by signed Interconnection Security Agreements (ISA)
19	Is the system operated in more than one site?	Yes No – If NO, go to question 20. All programs and data are referenced from a central application, and database server.
19.1	How will consistent use of the system and data be maintained in all sites?	

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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/RD application users and accounting managers, NITC and FSA IT support personnel (system, operations, DBAs), and FSA application developers.
21	How will user access to the data be determined?	Access must be requested through FSA- 1 3A security forms with justification. System logical security restrictions and exercise of physical security at the data center.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes s N
22	How will user access to the data be restricted?	Users are restricted based on group and userid level security determined by specific roles and granted through ACF2 and IDMS.
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 N o Banner is the first line of defense. System access is issued on a need to know only basis. Employee security awareness training informs

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 USDA Privacy Office.

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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 6413 1-3055 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.	
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?	
28	How will the system and its use ensure equitable treatment of customers?	By providing a centralized and standardized method of accounting for program loans.
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	

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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 Online queries and batch processing using name, SSN, address, loan information, census type data, bank information.
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Online queries and batch processing using name or SSN.
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 .)	Farm Records File (Automated), USDA/FSA-2 Applicant/Borrower, USDA/FSA-14
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes No Possibly if the modification results in data, record storage location, or routine use that is not covered by the SORN identified above

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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?	

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.