



**Privacy Impact Assessment
(PIA)
Financial Management Systems-SCOAP
(FMS-SCOAP)**

Revision: 1.01



Farm Service Agency

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Privacy Impact Assessment for
Financial Management Systems-SCOAP
(FMS-SCOAP)



Document Information

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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 **Financial Management Systems-SCOAP** 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:	Financial Management Systems-SCOAP
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	Financial Management System (FMS) State and County Office Automated Project (SCOAP), which collects service center accounting transactions transmitted from the State and Counties, the National Payment Service (NPS), and National Receipts and Receivables System (NRRS) and passes validated data to CORE for the generation of accounting entries.
Who owns this system? (Name, agency, contact information)	Angela Sieg FSA/ITSD/ADC/AFAO 6501 Beacon Drive Kansas City MO 64133 (816) 926-1568 Angela.Sieg@kcc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (IS SPM) 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)	Thomas Cranwill 6501 Beacon Drive Kansas City MO 64133 (816) 926-2154 thomas.cranwill@kcc.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.	Detail transaction data is passed to multiple subsidiary systems and also retained in FMS-SCOAP (SCOAP2 database).
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.	Manual inputs by FSA employees; Financial Management System -- State & County Office Automation Project (FMS-SCOAP) Financial Management Reporting System Data Warehouse: Detail transaction data is received from FMS-SCOAP. Summary transaction data is passed from
4.1	What data is being collected from the customer?	Name, Address, SSN, TIN
4.2	What USDA agencies are providing data for use in the system?	N/A
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, Peanut Marketing Association, banking institutions, CADE Data File, Farmers, Producers, vendors.
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. Customer information is collected by FSA State and County offices.

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No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	<p>Accuracy will be verified using: Standard Accounting Practices; CTCS has Interface stats reports and balancing controls, Automated system validations.</p> <p>Completeness will be checked using a mixture of human and automated review by:</p> <ul style="list-style-type: none"> -System edit validations, -Daily balancing comparing General Ledger activity with applicable subsidiaries. -Each payment must contain minimal FSA accounting information or the payment will be rejected. Service Center employees are responsible for the 'certification' approval and 'signing' approval of each payment request. -Control records on batch interface files
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	See 5.1 above
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	See 5.1 above

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?	FOIA provides member payment data (1614) to requesting organizations for statistical and public reporting.
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	Ye s No

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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 s
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?	
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 is used for service center and National Payment Service (NPS) accounting transactions.
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?	FOIA provides member payment data (1614) to requesting organizations for statistical and public reporting.
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?	

3.3 Data Retention

No.	Question	Response
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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?	Up to 6 years and longer in some instances.
14.2	What are the procedures for purging the data at the end of the retention period?	Refer to USDA standard media disposal policy and procedure found in FSA 6-IRM and USDA DR 3601-001
14.3	Where are these procedures documented?	Refer to USDA standard media disposal policy and procedure found in FSA 6-IRM and USDA DR 3601-001
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?	Data, after completion is not altered. The information is protected by agency policies and the security controls issued by USDA. The key is to ensure the accuracy of this data prior to entering it into the system. The key method utilized is the Acceptance Testing process.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Ye s 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. Financial Management System: Data from 1614 is extracted from FMRS and provided to the FOIA group for disbursement IRS Reporting System: IRS , Government Agencies upon request, FOIA requests.
17.1	How will the data be used by the other agency?	Financial Management System: FOIA provides member payment data (1614) to requesting organizations for statistical and public reporting. CORE: Eliminations entry for financial statements. IRS Reporting System: Reporting information to the IRS

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No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	Financial Management System: FOIA CORE: Receiving agency is responsible for following OMB guidance. IRS Reporting System: FSA/FMD
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?	
19	Is the system operated in more than one site?	Yes No – If NO, go to question 20. Financial Management System & CORE: - No IRS Reporting System: Yes
19.1	How will consistent use of the system and data be maintained in all sites?	IRS Reporting System: Consult 61RM for details of the configuration management process for this system.

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
21	How will user access to the data be determined?	Data is segregated by functional responsibility. FAO maintains the internal application security table
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes s No
22	How will user access to the data be restricted?	No restrictions to read data. Write capabilities are restricted by User ID. FAO maintains the internal application security table.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes s

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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.)?	Production Adjustment and Risk Management Office and USDA Privacy Office.
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. Common FSA incident reporting process. 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?	

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No.	Question	Response
28	How will the system and its use ensure equitable treatment of customers?	The Financial Management Systems are implemented using a methodology that ensures data processing will be accomplished in the same manner for all customers.
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
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data is retrieved based on level it was recorded. Financial Management Systems and FMRS : 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/F SA-14
30.3	If the system is being modified, will the SOR require amendment or revision?	Ye s

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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?	

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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.