USDA Privacy Impact Assessment

Fiscal Year 2024

Privacy Division (PD)
Cybersecurity and Privacy Operations Center (CPOC)
U.S. Department of Agriculture

Revisions

Date	Version	Notes
09/06/2023	1.0	Documented created.
02/12/2025	1.1	Removed "Gender" and "Sexual Orientation" from Biographical Information in accordance with Executive Order 14168, "Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government."

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Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	Farm Program Conservation System (FPCS)
Program Office	Program Delivery Division
Mission Area	Farm Service Agency (FSA)
CSAM Number	1268
Date Submitted for Review	

Mission Area System/Program Contacts

Role	Name	Email	Phone Number
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Abstract

The abstract provides the simplest explanation for the “what does the system do?” and will be published online to accompany the PIA link.

The Farm Program Conservation System (FPCS) supports USDA Farm Service Agency's mission to deliver services to farmers involving environmental quality, conservation of natural resources, emergency conservation, land use and rural development. These programs manage contracts and payments between producers and the FSA in addition to supporting related data. The FPCS uses the information to maintain producer contracts and producer payments. The PIA is being conducted because this system contains PII.

Overview

The overview is the most important section of the PIA. A thorough and clear overview gives the reader the appropriate context to understand the responses in the PIA.

Farm Program Conservation System (FPCS) is owned by the Program Delivery Division (PDD) within USDA’s Farm Service Agency (FSA). FPCS includes FSA’s conservation and environmental programs which play an important role in helping protect and restore America’s farms, ranches, and grasslands while making them more resilient to threats and enhancing our natural resources. The programs affect the public at large due to their positive impacts on drinking water, greenhouse gas emissions, recreation, community health, and economic prosperity. FSA works with private landowners and managers to restore vegetative cover, rehabilitate streams and other water bodies, transition marginal or highly erosive lands to sustainable production levels, and apply conservation measures to enhance and maintain the quality of soil, water, and related natural resources and wildlife.

Over one million producers participating in the FPCS receive payments from the FPCS subsystems. Producer PII such as name and address are used to associate a FPCS contract with that producer and to make sure that the payment(s) associated with that contract reach the correct producer. This PII is not shared with any external systems. FPCS is comprised of 3 applications, which include (1) Biomass Crop Assistance Program (BCAP), (2) Conservation Contract Maintenance System (CCMS), and (3) Emergency Conservation Program (ECP). These applications serve as a centralized web-based tool used to maintain the Conservation Reserve Program (CRP) contract lifecycle, allocate, track, and maintain fund allocations at the national, state, and county levels for Emergency Conservation Program (ECP) and Grassland Reserve Program (GRP) programs, provide real-time fund/disaster allocation funds information, and provide emergency funding and technical assistance for farmers and ranchers to rehabilitate farmland damaged by natural disasters and for carrying out emergency water conservation measures in periods of severe drought. In recent versions of the FPCS subsystems, the amount of producer PII has been reduced so that only the minimum needed PII is stored. In many cases only the FSA internal Core Customer ID is stored. For this reason, it is not anticipated that changes to the FPCS systems will be made because of this PIA.

The legal authorities to operate the IT system include the following:

The legal authorities to operate the IT system are Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.), Executive Order 9397, the Agricultural Act of 2014 (Pub. L. 113-79), Agricultural Improvement Act of 2018 (Pub. L. 115-334), and the Coronavirus Aid, Relief, and Economic Security Act (CARES ACT) (Pub. L. 116-136). Additionally, these regulations pertain to Privacy Act (5 U.S.C. 552a), E-Government Act of 2002 (Pub. Law. 107-347, 44 U.S.C. §101), and Paperwork Reduction Act of 1995 (44 U.S.C. § 3501).

The completion of this PIA will not result in changes to business processes or technology changes.

Section 1: Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what SORN applies, if an ATO has been completed and if there is Paperwork Reduction Act coverage.

1.1. What legal authorities and/or agreements permit the collection of information by the project or system?

The legal authorities for the collection of information are: 7 U.S.C. 135b, 450j, 450k, 405l, 1281– 1393, 1421–1449, 1461–1469, 1471– 1471i, 1781–1787; 15 U.S.C. 714–714p; 16 U.S.C. 590a–590q, 1301–1311, 1501– 1510, 1606, 2101–2111, 2201–2205, 3501, 3801–3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469

1.2. Has Authorization and Accreditation (A&A) been completed for the system?

Security Plan Status:	Authorized to Operate
Security Plan Status Date:	March 1, 2024
Authorization Status:	Completed
Authorization Status Date:	February 29, 2024
Authorization Termination Date:	March 1, 2027
Risk Review Completion Date:	February 8, 2024
FTPS 199 Classification of the System:	Moderate

1.3. What System of Records Notice(s) (SORN(s)) apply to the information?

The following SORN[1] covers FPCS: FSA-2, FSA-14.

1.4. Is the collection of information covered by the Paperwork Reduction Act?

The collection of information is covered by the Paperwork Reduction Act under OMB control number 0560-0125 with agency code 005-49.

[1] 01-22579.pdf

Section 2: Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.

2.1. What information is collected, used, disseminated, or maintained in the system/program?

PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional sensitive PII is collected, used, disseminated, created, or maintained, please list those in the text box below:

Identifying Numbers

☐ Social Security number	☐ Truncated or Partial Social Security number	☐ Driver's License number
☐ Passport number	☐ License Plate number	☐ Registration number
☒ File/Case ID number	☐ Student ID number	☐ Federal Student Aid number
☐ Employee Identification number	☐ Alien Registration number	☐ DOD ID number
☐ Professional License number	☐ Taxpayer Identification number	☐ Business Taxpayer Identification number (sole proprietor)
☐ Credit/Debit Card number	☐ Business Credit Card number (sole proprietor)	☐ Vehicle Identification number
☐ Business Vehicle Identification number (sole proprietor)	☐ Personal Bank Account number	☐ Business Bank Account number (sole proprietor)
☐ Personal Device Identifiers or Serial numbers	☐ Business Device Identifiers or Serial numbers (sole proprietor)	☐ Personal Mobile number

☐ Health Plan Beneficiary number
☐ Business Mobile number (sole proprietor)
☐ DOD Benefits number

Biographical Information

☒ Name (Including Nicknames)
☐ Business Mailing Address (sole proprietor)
☐ Date of Birth (MM/DD/YY)

☐ Ethnicity
☐ Business Phone or Fax Number (sole proprietor)
☐ Country of Birth

☐ City or County of Birth
☐ Group Organization/Membership
☐ Religion/Religious Preference

☐ Citizenship
☐ Immigration Status
☐ Home Phone or Fax Number

☒ Home Address
☒ ZIP Code
☐ Marital Status

☐ Spouse Information
☐ Children Information
☐ Military Service Information

☐ Race
☐ Nationality
☐ Mother's Maiden Name

☐ Personal Email Address
☐ Business Email Address
☐ Global Positioning System (GPS)/Location Data

☐ Employment Information
☐ Alias (Username/Screenname)
☐ Personal Financial Information (Including loan information)

☐ Education Information
☐ Resume or Curriculum Vitae
☐ Business Financial Information (Including loan information)

☐ Professional/Personal References

Biometrics

☐ Fingerprints
☐ Hair Color
☐ DNA Sample or Profile

☐ Retina/Iris Scans
☐ Video Recording

Distinguishing Features

☐ Palm Prints	☐ Eye Color	☐ Signatures
☐ Dental Profile	☐ Photos	

Characteristics

☐ Vascular Scans	☐ Height	☐ Weight
☐ Scars, Marks, Tattoos	☐ Voice/Audio Recording	

Device Information

☐ Device Settings or Preferences (e.g., Security Level, Sharing Options, Ringtones)	☐ Cell Tower Records (e.g., Logs, User Location, Time)	☐ Network Communication Data

Medical /Emergency Information

☐ Medical/Health Information	☐ Mental Health Information	☐ Disability Information
☐ Workers' Compensation Information	☐ Patient ID Number	☐ Emergency Contact Information

Specific Information/File Types

☐ Personnel Files	☐ Law Enforcement Information	☐ Credit History Information
☐ Health Information	☐ Academic/Professional Background Information	☐ Civil/Criminal History Information/Police Record
☐ Case Files	☐ Security Clearance/Background Check	☐ Taxpayer Information/Tax Return Information

2.2. What are the sources of the information in the system/program?

The information is supplied directly from the producers.

2.2.1. How is the information collected?

The information is collected from direct personal contact with the farmers, an enrollment process, and the issuing of payment contracts for conservation services.

2.3. Does the project/program or system use information from commercial sources or publicly available data. If so, explain why this is used?

No

2.4. How will the information be checked for accuracy? How often will it be checked?

Data collected from the customer is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the syste and then again when any required updates are made.

2.5. Does the system/program use third-party websites?

Not applicable

2.5.1. What is the purpose of the use of third-party websites?

Not applicable

2.5.1.1. What PII will be made available to the agency though the use of third-party websites?

Not applicable

2.6. **Privacy Impact Analysis**: Related to characterization of the information.

Follow the format below:

Privacy Risk: Privacy Act (PA) risks associated with the characterization of information may include:

Misclassification of Data: Incorrectly categorizing PII which can lead to inadequate protection measures, exposing sensitive data to unauthorized access or misuse.

Inadequate Security Controls: If PII is not properly identified and characterized, it may not receive the necessary security measures, increasing the risk of data breaches.

Over-collection of Data: Misunderstanding classification of information may result in collecting more data than necessary, violating principles of data minimization and increasing exposure to risk.

Mitigation: By implementing some or all the following mitigation actions, mission areas can effectively characterize personal identifiable information (PII), manage privacy risks, and comply with the PA requirements:

Data Classification Policy: Adhere to departments data classification policy that categorizes PII based on sensitivity and the potential impact of unauthorized access or disclosure.

Regular Data Inventory: Conduct regular inventories of personal information to identify and categorize the types of data collected, stored, and processed by the organization.

Contextual Information Use: Ensure that the context in which personal information is collected and used is considered when characterizing data, recognizing how this affects privacy risks.

Section 3: Uses of the Information

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.

3.1. Describe why and how the information collected, used, disseminated and/or maintained will support the program's business purpose?

The information supports delivery of services to farmers involving environmental quality, conservation of natural resources, emergency conservation, and land use and rural development by managing contracts and payments between the producers and FSA.

3.2. Does the system/project/program use technology to conduct electronic searches, queries, or analysis in an electronic database to discover or locate a predictive pattern or anomaly? If so, state how USDA plans to use such results.

The FPCS systems implement business rules to verify data is entered in a correct format and according to policy. Data that is not in the correct format or not according to policy can be rejected or prevent progress through the workflow.

3.3. **Privacy Impact Analysis**: Related to uses of the information.

Follow the format below:

Privacy Risk: Privacy act risks associated with the uses of information include:

Unauthorized Use of Data: PII may be used for purposes other than those for which it was collected, violating privacy principles and user expectations.

Data Misuse: Employees or third parties may misuse PII, either intentionally or unintentionally, leading to breaches of confidentiality and trust.

Inadequate Consent: If individuals are not adequately informed about how their data will be used, or if consent is not appropriately obtained, it can result in legal non-compliance and ethical concerns.

Mitigation: By implementing some or all the following mitigation actions, mission areas may better safeguard PII and ensure responsible use in compliance with PA requirement:

Purpose Limitation: Clearly define and communicate the specific purposes for which PII is collected and used, ensuring that it is not used for unrelated purposes without consent.

Data Minimization: Collect and use only the minimum amount of PII necessary to achieve the intended purpose, reducing the risk of misuse.

User Consent: Obtain explicit consent from individuals before using their personal information, particularly for purposes that go beyond the original intent of collection.

Section 4: Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information.

4.1. How does the project/program/system provide notice to individuals prior to collection?

Privacy Act Statements are placed on each form that collects PII. The statement notifies the individual of the authority to collect the information, what organizations may be legally authorized to receive it, how the information may be used, and individual's option to refuse to provide the information to USDA.

4.2. What options are available for individuals to consent, decline, or opt out of the project?

Individuals may decline to provide any of the information without penalty. However, refusing to provide some information could delay processing or result in the denial of their application. Users have the right to provide consent to access their information. To do so, the individual must make a written request to the information owner, system owner, or Privacy Officer to evaluate their request.

4.3. **Privacy Impact Analysis**: Related to notice.

Follow the format below:

Privacy Risk: **Privacy Act risks associated with notices include:**

Inadequate Disclosure: Notices may fail to adequately inform individuals about how their personal information will be collected, used, and shared, leading to misunderstandings about privacy practices.

Ambiguity: If notices are unclear or overly complex, individuals may not fully understand their rights or the mission area's data practices, leading to a lack of informed consent.

Non-compliance with Regulations: Failing to provide required notices as stipulated by the Privacy Act can result in legal penalties and regulatory scrutiny.

Mitigation: Implementing some or all the following mitigation actions, mission areas can better protect individual privacy rights and comply with privacy act requirements:

Clear Communication: Ensure that privacy notices are written in clear, accessible language. Avoid legal jargon to make it understandable for all users.

Regular Updates: Review and update privacy notices regularly to reflect changes in data practices, regulations, or business operations.

User Consent: Implement mechanisms for obtaining explicit user consent for data collection and processing and provide options for users to withdraw consent easily.

Section 5: Data Retention

The following questions are intended to outline how long information will be retained after the initial collection.

5.1. What information is retained and for how long?

All records found in FPCS are retained for 10 years and deleted only after the information is no longer needed for administrative, legal, audit or other operational purposes.

5.2. Has the retention schedule been approved by the USDA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.

The retention schedule has been approved by the USDA records office and NARA. The Records Schedule Number is DAA-0145-2017-0018.

5.3. **Privacy Impact Analysis**: Related to retention of information.

Follow the format below:

Privacy Risk: **Privacy act risks associated with the retention of information include:**

Excessive Data Retention: Retaining PII longer than necessary can violate data minimization principles, increasing the risk of unauthorized access and exposure.

Data Breaches: The longer PII is retained, the greater the risk of data breaches occurring, whether through hacking, accidental disclosures, or insider threats.

Non-compliance with Regulations: Failing to adhere to legal requirements regarding data retention periods can lead to regulatory penalties and legal liabilities.

Mitigation: Implementing the following mitigation actions, mission areas can ensure responsible retention of PII while complying with the PA.

Data Retention Policy: Use NARA data retention policies that outlines how long different types of PII will be retained and the rationale for those timeframes.

Regular Reviews: Conduct regular reviews of stored data to ensure compliance with retention policies and to identify information that is no longer necessary for business purposes.

Secure Disposal Procedures: Establish secure methods for the disposal of personal information that is no longer needed, such as shredding paper documents or using data-wiping software for electronic files.

Section 6: Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

6.1. With which internal organizations and/or systems is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

No application data is shared internally.

6.2. **Privacy Impact Analysis**: Related to internal sharing and disclosure.

Follow the format below:

Privacy Risk: Privacy risks associated with internal sharing and disclosure include:

Unauthorized Access: Employees may access PII without proper clearance, leading to potential misuse.

Data Breaches: Internal systems can be vulnerable to breaches, compromising PII.

Insider Threats: Employees with malicious intent may exploit their access to PII for personal gain.

Mitigation: Implementing the following mitigation actions, mission areas can manage the risk associated with external sharing and disclosure of personal information while complying with PA requirements.

Access Controls: Implement role-based access controls to limit who can access PII based on their job responsibilities.

Encryption: Use encryption for data in transit and at rest to protect PII from unauthorized access.

Regular Training: Provide ongoing training for employees on data privacy policies, the importance of protecting PII, and how to handle it securely.

With which external organizations (outside USDA) is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

Not applicable.

6.3. **Privacy Impact Analysis**: Related to external sharing and disclosure.

Follow the format below:

Privacy Risk: Privacy risks associated with external sharing and disclosure include:

Unauthorized Access: Sharing PII with third parties increases the risk of unauthorized access, especially if those parties do not have adequate security measures in place.

Data Breaches: External sharing can lead to data breaches, either through hacking or inadvertent exposure, resulting in unauthorized individuals gaining access to sensitive information.

Loss of Control: Once PII is shared externally, mission areas may lose control over how that information is used, which can lead to misuse or unauthorized applications of the data.

Mitigation: Implementing the following mitigation actions, mission areas can manage the risk associated with external sharing and disclosure of personal information while complying with PA requirements.

Data Sharing Policy: Develop a clear policy outlining the conditions under which PII can be shared externally, including legal and compliance requirements (ex.: Computer Matching Agreements, SORNs, Business Agreements).

Due Diligence: Conduct thorough due diligence on third parties before sharing personal data, ensuring their privacy standards and practices are comparable to the PA and USDA requirements.

Written Agreements: Establish written agreements or contracts with third parties that outline their responsibilities for safeguarding shared data and compliance with privacy laws.

Section 7: Redress

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about him or her.

7.1. What are the procedures that allow individuals to gain access to their information?

Should an individual wish to gain access to their information, they will need to make a written request to the system owner or FPAC FOIA Officer, to authenticate their identity and identity the records they request access to FPCS.

7.2. What are the procedures for correcting inaccurate or erroneous information?

Individuals must make a written request to the system owner, information system owner or Privacy Officer, authenticate their identity, identify the portion(s) of the record that needs to be corrected and describe whether their information is inaccurate or erroneous. Upon receipt and review of the request, if it is verified a correction needs to be made, the record will be corrected and a sample of the document with the correction will be transmitted to the individual who made the request.

Requests to correct a record should be sent directly a local or state FSA Office. All requests (1) must be in writing, (2) clearly identify the information that needs correction, (3) provide a reason why the information is incorrect, and (4) state what the correction should be.

7.3. How are individuals notified of the procedures for correcting their information?

In addition to normal notification through the SORN process, field technicians provide correction procedures to individuals upon request.

7.4. If no formal redress is provided, what alternatives are available to the individual?

Individuals may contact their administrative point of contact to obtain access to their information.

7.5. **Privacy Impact Analysis**: Related to redress.

Follow the format below:

Privacy Risk: Privacy Act risks associated with redress include:

Inadequate Processes: If the processes for individuals to seek redress for privacy violations are unclear or cumbersome, it can deter individuals from exercising their rights and lead to unresolved complaints.

Lack of Transparency: Not providing clear information about how redress mechanisms work can create confusion and mistrust among individuals regarding their rights and the agency's accountability.

Failure to Address Complaints: Mission areas or agencies may not adequately address or resolve complaints related to privacy violations, leading to dissatisfaction and potential legal repercussions.

Mitigation: Implementing the following mitigation actions, mission areas can enhance redress mechanisms, ensuring individuals have effective means to address privacy concerns.

Establish Clear Procedures: Develop and communicate clear procedures for individuals to submit complaints or requests for redress related to privacy violations.

User Awareness Campaigns: Educate users about their rights under the privacy act and the available redress mechanisms through workshops, newsletters, or online resources.

Dedicated Privacy Officer/Privacy Point of Contact: Appoint a dedicated privacy officer or other personnel responsible for handling redress requests and ensuring timely responses to complaints.

Section 8: Auditing and Accountability

The following questions are intended to describe technical safeguards and security measures.

8.1. How is the information in the system/project/program secured?

The FPCS employs a defense-in depth strategy. Web applications are protected by web application firewall and restrictive networking. The application server is configured using Center for Internet Security hardened images and all components employ and point protection and real-time monitoring for malicious activity. Access to the system is role-based and require multi-factor authentication for all accounts. All data transfer and storage utilities Federal Information Processing Standard (FPS 140-2) compliant encryption.

8.2. What procedures are in place to determine which users may access the program or system/project, and are they documented?

Access to PII is determined by user role and restricted access. Access to PII is granted by appropriate legal authorities. Applicable user and roles are documented in the System Security Plan.

8.3. How does the program review and approve information sharing requirements?

Any time organizations outside of USDA requests access to information, a data sharing agreement is created and routed through the Grants and Agreements Office for review. The Grants and Agreements Office ensures all stakeholders, to include, but not limited to the FPAC Privacy Officer, a Senior Agency Official, and receiving organization official, review and sign the data sharing agreement that lays forth the standards and rules for handling USDA PII.

8.4. Describe what privacy training is provided to users either generally or specifically relevant to the program or system/project?

Annual organizational training, including USDA Information Security Awareness Training & Acknowledgment of Rules of Behavior, is mandatory for all federal and contractor staff working with FPCS.

Privacy Impact Assessment Review

[USDA Privacy Office completes this section.]

Date reviewed by USDA Privacy Office: 6/9/2025

USDA Privacy Analyst (On behalf of USDA's Chief Privacy Officer):

Signed: TRACY HENDRIX Digitally signed by TRACY HENDRIX Date: 2025.07.02 05:36:59 -04'00'

Signature of Responsible Officials

The individuals below attest that the information they provided in this Privacy Impact Assessment is true and accurate.

Signed:_____

Doug Jones
System Owner
Farm Production and Conservation – Farm Service Agency
U.S. Department of Agriculture

Signed:_____

Samantha Jones
Mission Area Privacy Officer
Farm Production and Conservation – Business Center
U.S. Department of Agriculture

Signed:_____

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