

# Privacy Impact Assessment

## Commodity Operations Management Systems (COMS)

Policy, E-Government and Fair Information Practices

- Version: 1.4
- Date: November 13, 2019
- Prepared for: USDA OCIO-Policy,  
E-Government and Fair Information  
Practices (PE&F)





# **Privacy Impact Assessment for the Commodity Operations Management Systems (COMS)**

November 13, 2019

## **Contact Point**

**Jose Gonzales  
Agricultural Marketing Service  
202-378-5847**

## **Reviewing Official**

**Mark Brook  
AMS Privacy Act Officer  
United States Department of Agriculture  
(202) 205-0288**

## Abstract

The Commodity Operations Management Systems (COMS) consists of several subsystems which support efforts to acquire, market and dispense inventory of agricultural commodities to support the stabilization of prices.

## Overview

The system and its components assists the Commodity Operations in achieving domestic farm program price support objectives, produces a uniform regulatory system for the storage of agricultural products, and ensures the timely provision of food products for domestic and international food assistance programs and market development programs.

The system and its components also, supports the United States Warehouse Act and provides information on approved warehouses and current rates to county offices, warehouses and the general public via a searchable map.

- General System Description:

The Grain Inventory Management Systems (GIMS) resides on the NITC Mainframe. The application assists the Commodity Operations in achieving domestic farm program price support objectives, produces a uniform regulatory system for the storage of agricultural products, and ensures the timely provision of food products for domestic and international food assistance programs and market development programs.

The Approved Warehouse and Rate System (AWRS) is an interactive web server application that resides on the web farm. It is used to search for current approved warehouses and rates by state and county and display them in a report format on the screen. The data used to populate the maps is extracted from GIMS.

- Typical Transaction:

GIMS is an integrated online and batch database which controls, accounts for, and reports on the acquisition, storage and disposition of CCC owned inventories.

AWRS consists of 5 separate URLs that can be accessed directly or through links on the APHIS Warehouse services internet page. Users can click on the map by state and county or insert search criteria to receive a report or warehouses/rates.

- Information Sharing: N/A
- Module & Component Description: N/A
- Legal Authority to Operate: The Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.), and Executive Order 9397.

## Section 1.0 Characterization of the Information

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

### **1.1 What information is collected, used, disseminated, or maintained in the system?**

Name, street address, telephone, user ID, DUNS#, Warehouse code, Warehouse master code

### **1.2 What are the sources of the information in the system?**

Sources of the information in the system include the Uniform Grain Storage Agreement between Commodity Credit Corporation (CCC) and business partners including warehouse operators (information is entered by commodity. The business partners such as the warehouse operators' supply the information when they apply for programs/licensing.

### **1.3 Why is the information being collected, used, disseminated, or maintained?**

The Commodity Operations Management Systems (COMS) consists of several subsystems which support efforts to acquire, market and dispense inventory of agricultural commodities to support the stabilization of prices.

The information is being collected to account for the acquisition, storage and disposition of grain, peanut or oilseed inventory. The information is also used in the licensing of warehouses and individual employees of warehouse operators who hold service licenses as prescribed by the USWA.

In addition, this information may also be collected to maintain special storage agreements with the Government to store commodities owned by the Commodity Credit Corporation. This information is predominantly available to the general public

**1.4 How is the information collected?**

Information and forms are received both by email and by hard copy. Data is entered manually. Some data (service license numbers and holders) is transmitted to and received from electronic providers. Certain data elements are made available to the general public through a “batch” process, which involves the export of data into a text file, then processing into a consumable format.

Forms that collect COMS data are OMB approved, where applicable (USWA activities ONLY). The bulk of the COMS forms are exempt from OMB approval pursuant to the Food Security and Rural Investment Act of 2002 (Pub.L. 107-171).

WCMD staff is actively working to update our MRP 400 and intends to list all forms and relevant data points, as required by law, regulation, and policy.

**1.5 How will the information be checked for accuracy?**

The application programmatically limits data input fields to accept only certain data types and formats. Batch processes verify total records and dollars to ensure all records are complete and accurate. Commodity personnel manually verify the information for accuracy to source information according to their own business practices.

**1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

The Warehouse Act of 1916 and Food, Conservation and Energy Act of 2008 (Pub. L.110-246) define the authorities. GIMS maintains and manages storage contract agreements as outlined under the Uniform Grain and Rice Storage Agreement.

**1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

The privacy risks are moderate. The minimum amount of personally identifiable information is collected to satisfy the purpose of the system. The risks are mitigated using various control mechanisms. See below:

- All users must be uniquely identified and authenticated prior to accessing the application.
- Access to data is restricted

## Section 2.0 Uses of the Information

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

**2.1 Describe all the uses of information.**

Data is used to control, account for, and report on the acquisition, storage and disposition of the Commodity Credit Corporation (CCC) owned grain, peanut or oilseed inventory.

**2.2 What types of tools are used to analyze data and what type of data may be produced?**

N/A ....COMS does not utilize any analytical tools.

**2.3 If the system uses commercial or publicly available data please explain why and how it is used.**

The system does not use commercial or public data.

**2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.**

Access to the system and data are determined by business need and individual roles. Controls are in place to provide reasonable assurance that data integrity and confidentiality are maintained during process.

Controls are in place to ensure the correct handling of information include the following:

- End users are correctly identified and authenticated according to USDA and APHIS security policies for access management, authentication and identification controls.
- Audit logging is used to ensure data integrity
- All users are employees of USDA and complete Security and Privacy Awareness as required by the Department

## Section 3.0 Retention

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

### **3.1 How long is information retained?**

To adhere to the National Archives and Records Administration requirements, the information is maintained 6-10 years.

The COMS suite is currently scheduled under DAA-0161-2015-0003. This schedule is currently “owned” by FSA and may need to be reassessed.

### **3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?**

Yes, in accordance with USDA Directive DR 3080-001: Appendix A: Scheduling Records. The COMS suite has been scheduled under the Farm Service Agency under DAA-0161-2015-0003. WCMD staff is working to update the MRP 400 for re-scheduling of a variety of records.

### **3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.**

The retention period is based on a combination business need (i.e., how long do we need this information for our business process) and long-term usefulness. When records have reached their retention period, they are immediately retired or destroyed in accordance with the USDA Record Retention policies and procedures. During this period, the stored information may be at risk for viewing by unauthorized parties, data loss or destruction and non-availability. Access to computerized files are protected by access control software, physical access controls and if warranted, password-protected.

SORN USDA/FSA-2 States: Program documents are destroyed within 6 years after end of participation. However, FSA is under a records freeze.

According to Records Management DR3080-001 Disposition of Inactive Records: Records and other documents that are no longer sufficiently active to warrant retention in office space shall be removed as rapidly as possible by: (a) transfer to a Federal Records Center, or (b) transfer to a records retention facility meeting the requirements of 36 CFR Chapter 12, Subchapter B Records Management, Subpart K, 1228.224 through 1228.244, or (c) if authorized, by disposal. (see Appendix B – Records Disposition Procedures.)

## Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

**4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?**

N/A

**4.2 How is the information transmitted or disclosed?**

N/A

**4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**



N/A

## Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

**5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

N/A

**5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.**

N/A

**5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

N/A

**5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

N/A

## Section 6.0 Notice

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

**6.1 Does this system require a SORN and if so, please provide SORN name and URL.**

Yes. SORN USDA/FSA-2 and SORN USDA/FSA-14, <http://www.ocio.usda.gov/policy-directives-records-forms/records-management/system-records>

**6.2 Was notice provided to the individual prior to collection of information?**

Notice is provided on the relevant OMB approved or exempt forms.

**6.3 Do individuals have the opportunity and/or right to decline to provide information?**

Yes. FSA Privacy Policy states that “Submitting information is strictly voluntary.”

**6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

Yes, in accordance with FSA Privacy policy and the individual’s written consent.

**6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

The risk is considered moderate. Notification is automatically provided in the system of records notice (Federal Register publication): SORN: USDA/FSA-2 – Farm Records File (automated) and USDA/FSA-14 – Application/Borrower.

## Section 7.0 Access, Redress and Correction

The following questions are directed at an individual’s ability to ensure the accuracy of the information collected about them.

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

As published in SORN USDA/FSA-2 and SORN USDA/FSA-14: “An individual may obtain information about a record in the system which pertains to such individual by submitting a written request to the above

listed System Manager. The envelope and letter should be marked “Privacy Act Request”. A request for information should contain: Name, address, ZIP code, name of the system of records, year of records in question, and any other pertinent information to help identify the file. Requests should be directed to the AMS Privacy Act Officer, Mark Brook at AMS.FOIA@usda.gov or 202-205-0288.

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

As published in SORN USDA/FSA-2 and SORN USDA/FSA-14: “Individuals desiring to contest or amend information maintained in the system should direct their request to the above listed System Manager and should include the reason for contesting it and the proposed amendment to the information with supporting information to show how the record is inaccurate. A request for contesting records should contain: Name, address, ZIP code, name of the system of records, year of records in question, and any other pertinent information to help identify the file.”

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

Formal redress is provided via the FSA Privacy Act Operations Handbook

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

N/A

**7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

The risk associated with redress is considered low, as the public does not have access to the system or the data. While the public cannot access the system to update or change their personal information, they may update their information using form AD 2530 by submitting it to the appropriate APHIS official. The APHIS official will in turn update the system based on the information provided.

## Section 8.0 Technical Access and Security

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

**8.1 What procedures are in place to determine which users may access the system and are they documented?**

FSA-13-A is used to request user access to USDA and FSA information technology systems including specifying authorization for accessing the system. (Refer to Notice IRM-440). In addition, access to FSA web applications is gained via an online registration process similar to using the FSA-13-A form. For system specific detailed access see SSP.

**8.2 Will Department contractors have access to the system?**

Department contractors do not have access to the System

**8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

Once hired, privacy training and security awareness training is completed prior to gaining access to a workstation. The privacy training addresses user's responsibilities to protect privacy data and how to protect it.

**8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

GIMS - Yes, 9/18/2017 AWRS – Not within COMS

**8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

The logging/auditing mechanism is an inherited function. The Application does not generate its own log/audit information. Any logging and auditing of access, transactions or output is left to The Office of the Chief Information Officer (OCIO) -INFORMATION TECHNOLOGY SERVICES (ITS) TS, and eAuthentication Application.

**8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

The main risk associated with privacy is the exposure of unauthorized access to privacy information. The risk is considered moderate. Mitigating controls are in place to ensure privacy risks are minimal. Mitigated controls are mapped back to SSP in CSAM. Quarterly access reviews are done to ensure controls are mitigated.

## Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

**9.1 What type of project is the program or system?**

COMS is a Major application which consists of several subsystems which support efforts to acquire, market and dispense inventory of agricultural commodities to support the stabilization of prices.

**9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.**

No

## Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

**10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?**

Yes, no 3<sup>rd</sup> party website (hosting) or 3<sup>rd</sup> party application is being used.

**10.2 What is the specific purpose of the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

N/A

**10.3 What personally identifiable information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications.**

N/A

**10.4 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be used?**

N/A

**10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

N/A

**10.6 Is the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications purged periodically?**

N/A

**10.7 Who will have access to PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

N/A

**10.8 With whom will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

N/A

**10.9 Will the activities involving the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

N/A

**10.10 Does the system use web measurement and customization technology?**

N/A

**10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?**

N/A

**10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

N/A



## Agency Approval Signature

---

Jose Gonzalez  
Director, Warehouse and Commodity Management Division  
Agricultural Marketing Service  
United States Department of Agriculture

---

Preston F. Griffin  
MRP ISSPM  
Marketing and Regulatory Programs  
United States Department of Agriculture

---

Mark Brook  
AMS Privacy Act Officer  
Agricultural Marketing Service  
United States Department of Agriculture