

Privacy Impact Assessment Common Call Component (CCC)

Rural Development

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Privacy Impact Assessment for the Common Call Component

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Abstract

Common Call Component includes BRE (Business Rules Engine)/FICO Blaze and ECF/Imaging. BRE/FICO Blaze Advisor is a business rule management system, which enables business analysts, system analysts, application architects, and developers to create, manage, integrate, test, and deploy business rules. Electronic Customer File (ECF) / Imaging is a project that was designed to manage the electronic filing and retrieval of loan and grant documents for all Rural Development (RD) programs. This PIA is required because there is PII data in ECF/Imaging and BRE/FICO Blaze and the PTA determined that a PIA is required.

Overview

Common Call Component (BRE/FICO Blaze and ECF/Imaging) is not accessible by non-Federal entities or the public.

Business Rules Engine (BRE)/FICO Blaze is a business rules management system hosted on DISC at USDA. BRE/FICO Blaze is a software tool that is currently installed on a Windows 7 desktop computer. BRE/FICO Blaze is a business rule management system, which enables business analysts, system analysts, application architects, and developers to create, manage, integrate, test, and deploy business rules. BRE/ FICO Blaze supports loan underwriting and provides business rules throughout the RD loan and grant lifecycle, which contain PII. This desktop tool has an integrated set of development and deployment tools used for creating business rule services.

Electronic Customer File (ECF) / Imaging manages the electronic filing and retrieval of loan and grant documents for all Rural Development (RD) programs. ECF/Imaging is an internal document repository hosted on DISC at USDA. The flexibility of the ECF system allows authorized RD staff to retrieve loan and grant documents from a borrower level down to documents pertaining to a specific loan or grant. This structure provides the capability for authorized RD staff to view documents for a specific RD borrower that may span across different RD program areas in a single search. There are different methods ECF uses to ingest documents into the system. Documents can be scanned directly into ECF via the Customer Service Center (CSC) Front End processing group, faxed into ECF, imported from within the ECF application, added to ECF via the MS Office ECF Add-In or via web services leveraged by other RD applications such as CPAP, GLS, GUS and ReConnect. ECF utilizes an IBM FileNet Document repository to store, encrypt and protect the documents, while at rest. These documents, in many cases, contain PII information on the actual document.

ECF/Imaging uses scanning software and equipment to index, store and retrieve electronic images of RD loan and grant application documents and related paper requests sent to Rural Development. ECF/Imaging uses, generates, and stores RD grant and loan documents that contain PII.

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?

ECF/Imaging collects, uses and maintains the following information:

- USDA Employees
- Contractors
- Public
- Name
- Date and/or place of birth
- Address Information
- Personal identification number
- Financial data
- Employment history
- Miscellaneous identification numbers
- Handwriting or an image of the signature
- SSN/TIN

These modules of Common Call Components do not directly collect PII information. Information stays within the department and is maintained in the system. ECF/Imaging scans, faxes, and imports document images from internal RD loan and grant systems, which are CPAP, GLS, GUS and ReConnect.

BRE/FICO Blaze is a business rule management system, which enables business analysts, system analysts, application architects, and developers to create, manage, integrate, test, and deploy business rules for RD. BRE/ FICO Blaze supports loan underwriting and provides business rules throughout the RD loan and grant lifecycle, which contains PII.

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

ECF/Imaging receives information internally from CPAP, GLS, GUS and ReConnect. All USDA National, State and Field offices can add documents to the ECF document repository system.



BRE/FICO Blaze desktop tool supports underwriting and provides business rules throughout the loan and grant lifecycle, which contains PII. Authorized RD users have access to BRE/FICO Blaze to enter the business rules and support the underwriting at RD.

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

ECF/Imaging provides an electronic file repository of RD loan and grant applications and related paper requests provided to RD for processing. ECF/Imaging provides electronic access to RD loan and grant documents to facilitate RD mission/business needs.

BRE/FICO Blaze desktop tool supports underwriting and provides business rules throughout the loan and grant lifecycle, which contains PII. It is used with the RD applications that support loan and grants, including CPAP, GLS, GUS and ReConnect.

1.4 How is the information collected?

ECF/Imaging documentation is shared from RD internal applications (CPAP, GLS, GUS and ReConnect), the data warehouse or scanned in by authorized RD staff.

BRE/FICO Blaze develops, deploys and maintains business rules services. A business rule service automates policies and procedures as a service for BRE/FICO Blaze.

1.5 How will the information be checked for accuracy?

ECF/Imaging gets data feeds from internal RD applications, such as GLS, GUS, CPAP and ReConnect, data warehouse or is scanned by authorized RD staff. If an applicant or RD customer notices any data inaccuracy, then they would reach out to the RD staff and the data is corrected in the above RD data feeds and this is shared with ECF/Imaging.

BRE/FICO Blaze is managed by authorized RD staff, so they would correct any data inaccuracies that are detected during normal business processes that require data review and verification.

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

Information contained in ECF/Imaging and BRE/FICO Blaze fall under the following:

- *Privacy Act of 1974, as Amended (5 USC 552a);*
- *Computer Security Act of 1987, Public Law 100-235, ss 3 (1) and (2), codified at 15 U.S.C. 272, 278 g-3, 278 g-4 and 278 h which establishes minimum security practices for Federal computer systems;*

- *OMB Circular A-130, Management of Federal Information Resources, Appendix III, Security of Federal Automated Information Resources, which establishes a minimum set of controls to be included in Federal automated information security programs; assigns Federal agency responsibilities for the security of automated information; and links agency automated information security programs and agency management control systems;*
- *Freedom of Information Act, as Amended (5 USC 552), which provides for the disclosure of information maintained by Federal agencies to the public while allowing limited protections for privacy.*
- *Federal Information Security Modernization Act of 2014*
- *Consolidated Farm and Rural Development Act (7 U.S.C. 1921 et seq) and Title V of the Housing Act of 1949 as amended (42 U.S.C. 1471 et seq).*
- *Farm Bill 2018 (P.L. 115-334)*
- *Fair Credit Reporting Act, 15 USC 1681 a(f)*
- *Consumer Credit Protection Act, 15 USC 1601*
- *Equal Credit Opportunity Act, 15 USC 1691*
- *7 CFR, part 1770, subpart A and part 1773*
- *RD Records Management Policy*
- *NARA Records Retention*

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

BRE/FICO Blaze and ECF/Imaging system owners define access roles to ensure separation of duties, account management and authorized access to data and information in BRE/FICO Blaze and ECF/Imaging. These measures help mitigate the risks to privacy data in BRE/FICO Blaze and ECF/Imaging. BRE/FICO Blaze is a tool installed on the desktop of authorized RD staff.

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.

BRE/FICO Blaze is a business rule management system, which enables business analysts, system analysts, application architects, and developers to create, manage, integrate, test, and deploy business rules. BRE/ FICO Blaze supports loan underwriting and provides business rules throughout the RD loan and grant lifecycle, which contains PII.

ECF/Imaging uses scanning software and equipment to index, store and retrieve electronic images of RD loan and grant application documents and related paper requests sent to Rural Development. ECF/Imaging uses, generates, and stores RD grant and loan images documents



that contain PII. Documents can be scanned directly into ECF via the Customer Service Center (CSC) Front End processing group, faxed into ECF, imported from within the ECF application, added to ECF via the MS Office ECF Add-In or web services leveraged by other RD applications such as CPAP, GLS, GUS and ReConnect.

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

BRE/FICO Blaze does not currently use tools to analyze data. Authorized RD staff manually review information to ensure that RD applicant/customer information is accurate and meets the RD and USDA requirements.

ECF/Imaging does not currently use tools to analyze data. Authorized RD staff manually review information to ensure that RD applicant/customer information is accurate and meets the RD and USDA requirements.

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

Not applicable, ECF/Imaging is a document repository for internal RD use.

Not applicable, BRE/FICO Blaze uses data that is provided from the business rules, so it does not use commercial or publicly available 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.

The controls in place to detect unauthorized access to BRE/FICO Blaze and ECF/Imaging information includes DISC audit logs/security logs.

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?



Data retention requirements for the BRE/FICO Blaze and ECF/Imaging are in accordance with NARA, RD Records Management policy and financial compliance regulations.

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

Yes, BRE/FICO Blaze and ECF/Imaging follow data retention as provided by the RD Records Management, which is in accordance with NARA.

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

BRE/FICO Blaze and ECF/Imaging data retention has the potential risk of unauthorized access, unauthorized disclosure or illegal use of the customer PII data.

The RD customer data for BRE/FICO Blaze and ECF/Imaging is protected by the DISC hosting environment, which follows USDA federal agency requirements for data protection and is accredited by FedRAMP. BRE/FICO Blaze and ECF/Imaging follow the RD Records Management data retention requirements to manage risk associated with data retention.

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?

BRE/FICO Blaze has internal sharing with data feeds from GUS and Unify. This information is displayed and used to create a report for the authorized RD staff, who have BRE/FICO Blaze installed on their desktop.

ECF/Imaging gets internal data feeds from the data warehouse and internal RD applications, CPAP, GLS, GUS and ReConnect. Authorized RD staff can also scan or fax information into ECF using USDA scanning and faxing equipment. ECF/Imaging is an internal document repository for RD.

4.2 How is the information transmitted or disclosed?



BRE/FICO Blaze gets data feeds from GUS and Unify within the USDA network with all the security protections that USDA has for data within its network. Only authorized RD users' access BRE/FICO Blaze, which is installed on the desktop of authorized users as well as GUS and Unify.

ECF/Imaging gets internal data feeds from the internal RD applications, CPAP, GLS, GUS and ReConnect and from the data warehouse. Authorized RD staff can also scan or fax information into ECF/Imaging using USDA scanning and faxing equipment. Only authorized RD users' access ECF/Imaging as well as the internal RD applications and data warehouse that send the data feeds. Only authorized RD staff can scan and fax using USDA scanning and faxing equipment.

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.

DISC provides protection to the data in transit and at rest to BRE/FICO Blaze and ECF/Imaging, since they are hosted on the DISC hosting platform.

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?

Authorized RD staff of BRE/FICO Blaze manually validate RD data with CAIRVS, but this is a shared database of defaulted Federal debtors, so this is a trusted source for federal agencies.

ECF/Imaging is used internally as a RD document repository, so it does not share information externally.

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.

Yes, USDA/Rural Development 1, Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs covers the BRE/FICO Blaze's manual validation of data with CAIRVS as routine use of this information with Treasury.



ECF/Imaging does not share information externally, since it is an internal RD document repository.

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

The manual validation of data in BRE/FICO Blaze with CAIRVS is done with security protections in place with DISC for the data used in this process, which include audit logs and network security protections in place to protect RD data.

ECF/Imaging does not share information externally, since it is a document repository for internal authorized RD staff.

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

The risk of exposure of PII is mitigated by the audit logs in place with DISC and network security protections in place to protect RD data. Authorized RD staff for BRE/FICO Blaze manually validate RD data with CAIRVS, which is a trusted source of data for federal agencies. Also, BRE/FICO Blaze is installed on the desktop of the authorized RD staff, so it is protected by USDA network security protections.

ECF/Imaging is used internally by authorized RD staff, so there is no external sharing.

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, it follows Rural Development 1, Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants and Other Participants in RD Programs, <https://www.govinfo.gov/content/pkg/FR-2016-04-28/pdf/2016-09938.pdf>, but BRE/FICO Blaze and ECF/Imaging are not accessible to the general public.

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



Not applicable, BRE/FICO Blaze and ECF/Imaging are used internally by authorized RD staff, so it is not accessible to the general public.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging are used internally by authorized RD staff, so it is not accessible to the general public.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging are used internally by authorized RD staff, so it is not accessible to the general public.

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.

Not applicable, BRE/FICO Blaze and ECF/Imaging are used internally by authorized RD staff, so it is not accessible to the general public.

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?

Not applicable, BRE/FICO Blaze and ECF/Imaging are used internally by authorized RD staff, so it is not accessible to the general public.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging are used internally by authorized RD staff, so it is not accessible to the general public.

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

Not applicable, BRE/FICO Blaze is used internally for business rules management. Not applicable, ECF/Imaging is a document repository for authorized RD staff, so it is used internally.

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

Not applicable, BRE/FICO is used internally for business rules management, so there is no need for redress as it is not accessible by the general public. Not applicable, ECF/Imaging is a document repository for authorized RD staff, so it is used internally and not accessible to the general public.

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

Not applicable, redress is not needed for BRE/FICO Blaze or ECF/Imaging, since these are used internally by authorized RD staff.

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?

Desk Procedures document the User Access Management (UAM) Team process for establishing, activating, and modifying individual users for ECF/Imaging. The group and account types are defined by the System Owner for ECF/Imaging. The System Point of Contact (POC) assigns group membership and determines individual RD user access. The UAM Team creates, modifies and deletes user requests approved by the System Point of Contact.

RD employees and RD contractors' access ECF/Imaging after being provisioned in E-Authentication by a User Access Management (UAM) ticket, created by the System POC and completed by the UAM Team (UAMT).

Steps to provision RD employees and RD contractors follow desk procedures as set by the system owner for ECF/Imaging.

The BRE/FICO Blaze is installed on the desktop of the authorized users, so the RD user follows all USDA access control processes, such as desk procedures and UAM Team provisioning with the System Owner providing group membership and individual RD user access.



8.2 Will Department contractors have access to the system?

Yes, RD contractors are required to undergo the same access and authentication procedures that RD federal employees follow, as discussed in section 8.1. BRE/FICO place is installed on authorized RD staff desktops.

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

Yes, all RD employees and contractors are required to complete annual information security and awareness training, which includes privacy training for BRE/FICO Blaze and ECF/Imaging.

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

Yes, Common Call Component has an ATO, which is in CSAM.

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

Common Call Component complies with the Federal Information Security Modernization Act of 2014 (FISMA) by documenting the Authorization and Accreditation, annual control self-assessments, and continuous monitoring in accordance with National Institute of Standards and Technology (NIST) Special Publication 800-53, Rev. 4. Common Call Component, BRE/FICO Blaze and ECF/Imaging, is hosted on the DISC platform at USDA, which is FedRAMP certified and uses USDA network security protections.

Access to ECF/Imaging is controlled through Level 2 E-Authentication, and access to sensitive information is controlled through DISC Profiles/Groups on a need-to-know basis with audit logs of user activity for Common Call Component. The User Access Management Team has standard desktop procedures and a roles matrix defining the level of access and how to provision this access to the users for ECF/Imaging. They audit the list of users and applications that they have access to. User Access Management verification reports can be used to verify these groups, are assigned appropriately and account management controls are in place.

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?

Since Common Call Component is used by internal authorized RD staff and there are group access management controls, the privacy risks are minimal. Potential compromise of privacy data is mitigated by DISC audit event monitoring and USDA network security protections in place to protect RD data for Common Call Component (BRE/FICO Blaze and ECF/Imaging). Additionally, ECF/Imaging is accessed using E-Authentication through the USDA network.

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?

BRE/FICO Blaze is a business rule management system, which enables business analysts, system analysts, application architects, and developers to create, manage, integrate, test, and deploy business rules. BRE/ FICO Blaze supports loan underwriting and provides business rules throughout the RD loan and grant lifecycle, which contain PII.

ECF/Imaging uses scanning software and equipment to index, store and retrieve of RD loan and grant application documents and related paper requests sent to Rural Development. ECF/Imaging uses, generates, and stores RD grant and loan documents that contain PII. Documents can be scanned directly into ECF via the Customer Service Center (CSC) Front End processing group, faxed into ECF, imported from within the ECF application, added to ECF via the MS Office ECF Add-In or web services leveraged by other RD applications, such as CPAP, GLS, GUS and ReConnect.

For all technologies chosen by RD, an Analysis of Alternatives (AoA) is completed to determine which technologies will be selected and ultimately purchased or built.

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

No, the project utilizes Agency approved technologies for BRE/FICO Blaze and ECF/Imaging, and these technology choices do not raise privacy concerns.

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, the system owner and the ISSPM have reviewed the OMB memorandums.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

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



Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.

10.10 Does the system use web measurement and customization technology?

No, BRE/FICO Blaze and ECF/Imaging do not use web measurement and customization technology.

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?

Not applicable, Common Call Component, BRE/FICO Blaze and ECF/Imaging do not use web measurement and customization technology.



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

Not applicable, BRE/FICO Blaze and ECF/Imaging do not use 3rd party websites and/or applications.



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