



Office of the Chief Information Officer
U.S. DEPARTMENT OF AGRICULTURE

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."

Table of Contents

Privacy Impact Assessment for the USDA IT System/Project	4
Mission Area System/Program Contacts	4
Abstract	5
Overview	5
Section 1: Authorities and Other Requirements.....	6
Section 2: Characterization of the Information.....	7
Section 3: Uses of the Information	9
Section 4: Notice	10
Section 5: Data Retention	11
Section 6: Information Sharing.....	12
Section 7: Redress.....	13
Section 8: Auditing and Accountability	14

Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	Encompass Lending Platform
Program Office	Rural Development
Mission Area	Single Family Housing Direct Home Loans
CSAM Number	
Date Submitted for Review	09/13/2024, updated 10/22/2025,

Mission Area System/Program Contacts

Role	Name
MA Privacy Officer	Ryan Schneider
Information System Security Manager	Elinor Gallelli
System/Program Managers	Tony Sanchious

Abstract

ICE is partnering with the USDA RD to replace their legacy Loan Origination System (LOS) with an advanced streamline LOS which will provide a standard, web-based, loan origination scalable platform that allows consumers to complete and submit a loan application using modern browsers. The type of federal data that will be processed is borrower PII to include SSN and other key personal and financial information.

Overview

The Encompass Lending Platform (ELP) is a modern loan origination system designed to replace the USDA Rural Development (RD) LOS in support of the Single-Family Housing Direct Home Loans Program. ELP provides a secure, web-based solution that streamlines the end-to-end loan application and approval process for both applicants and USDA staff. Through the platform, borrowers can complete, submit, and track loan applications online using any standard web browser.

The system collects and processes PII and financial data necessary to determine loan eligibility, perform underwriting, and manage servicing activities. This includes identifiers such as name, Social Security number, date of birth, and income or employment information, along with other data required to evaluate borrower qualifications. The collection, maintenance, and use of this information are governed by System of Records Notice (SORN) USDA/RD-1. Information is collected directly from applicants and verified through authorized third-party systems such as credit reporting agencies and financial institutions.

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.

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

The collection of information for this project is authorized under the Housing Act of 1949 and Chief Financial Officer's Act of 1990. Notice and consent are obtained through the applicable contract or end-user agreement.

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

The system has not yet completed its A&A process.

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

Based on the currently available SORNs applicable to the USDA and the collection of data related to mortgage information, the information collected under this project would be covered by USDA/RD-1.

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

No

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.

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.

Identifying Numbers:

- Social security number
- File/Case ID number
- Employee identification number
- Truncated or partial social security number
- Personal bank account number
- Driver's license number
- Personal mobile number

Biographical Information:

- Name (including nicknames)
- Ethnicity
- Citizenship
- Home address
- Spouse information
- Race
- Personal email address
- Employment information
- ZIP code
- Business email address
- Date of birth (MM/DD/YY)
- Home phone or fax number
- Marital status
- Military service information
- Personal financial information (including loan information)

Distinguishing Features:

- Signatures
- Photos

Specific Information/File Types:

- Personnel files
- Credit history information
- Taxpayer information/Tax return information

The types of information collected, used, disseminated, or maintained by the system are based on current program requirements and may be refined or expanded in the future to align with evolving USDA.

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

The sources of information are expected to include individuals and entities submitting mortgage or loan applications. The specific sources will ultimately depend on the data collection requirements and systems mandated by USDA. Since the system has not yet completed its A&A, the final sources of information are still to be fully determined.

How is the information collected?

Information will be collected through electronic submission and automatically gathered from authorized external systems during the submission process.

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

The system may use information from commercial or publicly available sources when necessary to verify eligibility, validate applicant information, or support mortgage processing activities.

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

Information accuracy will be verified, but the methods and periodicity has not yet been determined and is pending USDA guidance, system requirements, and A&A compliance needs.

Does the system/program use third-party websites?

No

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

N/A

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

None.

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

Potential for collecting, categorizing, or interpreting data inaccurately.

Mitigation

Data minimization practices, validation checks, adherence to USDA data classification standards, and periodic reviews.

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.

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

The information is collected during the loan application process and entered into the LOS to support eligibility determination, underwriting, approval, and servicing of USDA mortgage and loan programs.

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.

Credit scores are used as part of the applicant evaluation process to assess financial reliability and determine eligibility for USDA loan programs.

Privacy Impact Analysis: Related to uses of the information.

Privacy Risk

Potential misuse, unauthorized disclosure, or inaccurate interpretation of sensitive financial information.

Mitigation

Access controls, encryption, data minimization, and adherence to privacy, security, and fair lending policies.

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.

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

Notice is provided to individuals prior to collection through clearly stated privacy and disclosure language included in the loan application materials, online submission notices, and related consent agreements.

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

Because the information is necessary to determine eligibility for USDA loan programs, declining or opting out of data collection would generally make an individual ineligible to participate. However, applicants may withdraw their application at any time prior to approval or choose not to provide optional information.

Privacy Impact Analysis: Related to notice.

Privacy Risk

Individuals may not fully understand how their information will be used, shared, or retained.

Mitigation

Clear, accessible, and standardized notice language.

Section 5: Data Retention

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

What information is retained and for how long?

Information retained by the system will include applicant and borrower data such as personal identifiers, contact details, income and employment information, credit data, property details, and loan processing records. Temporary. Destroy 6 years after close of fiscal year, but longer retention is required if needed for business use.

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.

GRS 1.1 Financial Management and Reporting Records DAA-GRS-2014-0002-0003

Privacy Impact Analysis: Related to retention of information.

Privacy Risk

Personal and financial data may be retained longer than necessary, increasing the potential for unauthorized access, data breaches, or misuse over time

Mitigation

Adherence to USDA and NARA retention schedules, implementation of secure storage and disposal procedures, and periodic reviews to ensure records are retained only for the minimum period necessary to meet program and legal obligations.

Section 6: Information Sharing

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

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?

Information sharing within Encompass will depend on the specific services and functions configured by each participating lender. The system is designed to integrate with authorized data sources to support loan origination, underwriting, and servicing activities. Shared information may include applicant identifiers, income and employment data, credit details, property information, and loan status updates. Data transmissions will occur through secure, encrypted channels consistent with USDA and federal requirements.

Privacy Impact Analysis: Related to internal sharing and disclosure.

Privacy Risk

Potential for unauthorized access, misuse, or overexposure of sensitive personal and financial information.

Mitigation

Strict role-based access controls, need-to-know restrictions, data encryption, continuous monitoring, and adherence to USDA privacy and information security policies.

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?

Information may be shared with or received from authorized external organizations, such as credit reporting agencies, financial institutions, property valuation services, and identity verification providers, to support mortgage eligibility determinations, underwriting, and servicing activities. Shared data may include applicant identifiers, credit information, income verification, property details, and loan status updates necessary to validate eligibility and ensure compliance with lending requirements. All information exchanges will occur through secure, encrypted channels and will be governed by formal agreements ensure compliance with USDA privacy and security standards.

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk

Potential for unauthorized access, misuse, or loss of sensitive personal and financial data once transmitted outside USDA's direct control.

Mitigation

Encryption of all data in transit and continuous monitoring of external connections.

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.

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

Individuals may request access to their information in accordance with the Privacy Act of 1974 and USDA privacy procedures.

What are the procedures for correcting inaccurate or erroneous information?

Individuals may request correction of inaccurate or erroneous information in accordance with the Privacy Act of 1974 and USDA policies and procedures outlined in USDA/RD-1 SORN.

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

Individuals are notified of the procedures for correcting their information through the Privacy Act Statement, the applicable SORN, and USDA program materials such as loan application forms, system user guides, or online privacy notices.

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

If no formal redress process is available, individuals may still seek assistance by contacting the USDA program office or Privacy Officer to request an informal review or clarification of their records as outlined in USDA/RD-1 SORN.

Privacy Impact Analysis: Related to redress.

Privacy Risk

Lack of clear or accessible procedures for individuals to challenge or correct inaccurate information.

Mitigation

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

Section 8: Auditing and Accountability

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

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

Information within the system is protected in accordance with USDA and federal information security standards. Security controls are implemented through the Encompass Lending Platform (ELP) and include encryption of data in transit and at rest, role-based access controls, multi-factor authentication, continuous monitoring, and regular vulnerability assessments. Additional details regarding system architecture, data protection mechanisms, and control implementation are described in the Encompass Lending Platform (ELP) System Description. The system has not yet completed its A&A process, and final security configurations remain to be determined.

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

User access to the system will be determined based on defined roles, responsibilities, and the principle of least privilege. Access authorization procedures will include identity verification, management approval, and documented role assignments to ensure users are granted only the permissions necessary to perform their job functions. These procedures will be formally documented in the system's access control policy and security plan, consistent with USDA and federal information security requirements. The system has not yet completed its A&A process, and the final access authorization procedures and documentation remain to be determined.

How does the program review and approve information sharing requirements?

Information sharing requirements will be reviewed and approved through established governance and compliance processes. Proposed data exchanges will be evaluated to ensure they align with USDA requirements, the Privacy Act of 1974, and federal information security requirements. The system has not yet completed its A&A process, and final information-sharing review procedures remain to be determined.

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

All users with access to the system will be required to complete mandated annual privacy and security awareness training, which covers the handling of PII, data protection responsibilities, incident reporting procedures, and compliance with the Privacy Act of 1974 and related federal policies. Additional role-based training may be provided for personnel with elevated privileges or specific responsibilities. The system has not yet completed its A&A process, and final training requirements specific to this program remain to be determined.