

# Privacy Impact Assessment

## CLP Servicing; 3 of 7 – Guaranteed Loan System (GLS)

Technology, Planning Architecture, & E-Government

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## Abstract

GLS records and manages obligations, servicing, and loss claims for guaranteed programs, as well as managing and monitoring lenders. GLS consists of seven internal modules that include Farm Service Agency Guaranteed (FSAG), Guaranteed Annual Fees (GAF), Guaranteed Loan (GuarLoan), Intermediary Relending Program (IRP), Multi-Family Housing Guaranteed (MFHG), Electronic Status Reporting (ESR) and Single-Family Housing (SFH Loss). This PIA is required because PII data is being collected, processed or stored in the GLS components and the PTA determined that a PIA is required.

## Overview

The USDA relies on its information technology systems, including GLS, to accomplish its mission of providing cost-effective and reliable services to the USDA, other Federal agencies, and the public at large. GLS is an online, public-facing transaction entry and inquiry financial and accounting system accessed by USDA employees and contractors in over 700 field offices, the National office, and Finance office. USDA trusted partners (lenders) can access the GAF, GuarLoan, IRP, ESR, and SFH Loss components in GLS. Information to GLS is provided by updates from external trusted partners (Lenders) that provide loan status data via monthly reporting period uploads. GLS is hosted internally on the Digital Infrastructure Services Center (DISC) mainframe at <https://gls.sc.egov.usda.gov>.

FSAG is an application that includes loan origination, loan closing, losses, secondary market transactions, lender portfolio management, servicing actions, re-amortizations, consolidations, transfers, agency loan repurchases, liquidation expenses, interest assistance payments, status reporting. FSAG is accessible at <https://fsag.sc.egov.usda.gov>.

GAF is an application that provides an automated means to retrieve billing of annual fees against guaranteed loans and submits annual fee payment requests. GAF is accessible at <https://gaf.sc.egov.usda.gov>.

GuarLoan is an application that includes common or shared applications used by two or more loan programs within FSA, including loan origination, funds reservation, loan closing, annual fees, late fees, losses, secondary market transactions, lender portfolio management, servicing actions, re-amortizations, consolidations, transfers, agency loan repurchases, liquidation expenses, interest assistance payments, and status reporting. GuarLoan is accessible at <https://guarloan.sc.egov.usda.gov>.

IRP is an application that provides loans to local organizations (intermediaries) for establishing revolving loan funds. These funds assist with financing business and economic development activity to create/retain jobs in disadvantaged/remote communities. IRP is accessible at <https://rlp.sc.egov.usda.gov>.

MFHG applications include loan origination, funds reservation, loan closing, losses, secondary market transactions, lender portfolio management, servicing actions, re-amortizations, consolidations, transfers, agency loan repurchases, liquidation expenses, interest credit payments, and credit bureau status reporting. MFHG is accessible at <https://mfhg.sc.egov.usda.gov>.

ESR is an application that electronically captures current loan status and delinquency information. Monitors USDA portfolio and lender performance. Provides reports on servicers and default status on a monthly basis. ESR is accessible at <https://esr.sc.egov.usda.gov>,

SFH Loss application automates the Guaranteed SFH Loss claims process by allowing lenders to electronically enter and transmit loss data and disburse loss payments to the lender via electronic funds transfer (EFT). This process allows for accurate and timely processing of SFH Loss claims data. SFH Loss is accessible at <https://sfhloss.sc.egov.usda.gov>.

## 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?**

GLS records and manages loan obligations, loan servicing, and loss claims for guaranteed loan programs, as well as manage and track lenders. GLS collects the following borrower information: full name, address, contact information (telephone number and email address), Taxpayer Identification Number (TIN), Social Security Numbers (SSNs), Lender name, Lender address and contact information, bank account numbers, and loan account information.

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

Business Programs/Community Facilities/MFHG/FSAG applications, closing documentation, phone personal interviews, and/or correspondence are received via GLS. RD personnel enters this information into GLS while SFH Loss allows for document upload.

SFH applications, closing documentation, phone and personal interviews, and correspondence are received via USDA Guaranteed Underwriting System (GUS)2.

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

Information is collected to monitor USDA-guaranteed private sector lender's loan portfolios and to provide financial information on the Guaranteed portfolio. RD collects the information to determine eligibility and for consolidated reporting purposes, such as to the Internal Revenue Service (IRS) and related federal entities for financial compliance.

### **1.4 How is the information collected?**

RD borrowers provide the information, which is entered in the GLS application by RD personnel or lenders. Borrowers could be individuals or organizations; Loan officers and trusted lenders provide input for guaranteed loan application data. RD receives a monthly file of banking data from the U.S. Department of Treasury and Ginnie Mae. Information in SFH Loss comes directly from the Lender. SFH Application data is received directly from GUS2 through Mulesoft via manual entry of file upload directly from lenders.

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

The information is transferred to paper forms which are printed and signed by the customer. Only authorized, GLS users can enter or update data into the system. Transaction security defines what data users can update.

There are many balancing processes that execute with every batch update cycle to validate the lender's loan portfolios. Balancing is done against general ledger, allotment summary, and check disbursement. The National Financial and Accounting Operations Center (NFAOC) within RD reviews these outputs daily.

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

Information in the GLS application falls under the following:

- *Privacy Act of 1974, as Amended (5 U.S.C. § 552a)*
- *OMB Circular A-130, Managing Information as a Strategic Resource, July 2016*
- *Freedom of Information Act, as amended (5 U.S.C. § 552)*
- *Federal Information Security Modernization Act of 2014 (also known as FISMA), (44 U.S.C. §3551), December 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 U.S.C. §1681f*
- *Consumer Credit Protection Act, 15 U.S.C. §1601, et. seq.*

- *Equal Credit Opportunity Act, 15 U.S.C. §1691, et. seq.*
- *The Fair Debt Collection Practices Act, 15 U.S.C. §162, et. seq.*
- *7 CFR Part 3550, Direct Single Family Housing Loans and Grants*
- *7 CFR Part 3555, Guaranteed Rural Housing Program*
- *7 CFR Part 3560, Direct Multi-Family Housing Loans and Grants*
- *USDA RD Instruction 2033-A – Records, Management of RD Records (updated as of 8-2020)*
- *NARA General Records Schedules (provides mandatory disposition instructions for records common to several or all Federal agencies)*

**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 risk is the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the RD customer.

The GLS system owner defines access roles to ensure separation of duties, account management and authorized access to data and information in GLS. Only authorized RD staff and RD partners (lenders) can access the GLS application using eAuthentication (eAuth) Level 2. These measures mitigate the risks to privacy data in GLS. GLS is hosted on the Digital Infrastructure Services Center (DISC) environment, which complies with all security and privacy protections required by USDA as a federal agency.

## 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.**

GLS provides for the recording and management of loan obligations, servicing, and loss claims for guaranteed programs, as well as managing and monitoring lenders. GLS collects this information to monitor USDA-guaranteed private sector lender's loan portfolios and to provide financial information on the GLS portfolio. The data is also used to determine eligibility and for consolidated reporting purposes, such as demographic data.

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

GLS does not use tools. Authorized RD staff manually review information to ensure that RD applicant/customer information and financial transactions are accurate and meet the RD business rules and USDA requirements.

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

Not applicable, GLS 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 GLS information or transactions include DISC audit and security logs. There are logs for eAuthentication, which is how the authorized RD staff identify and authenticate to access GLS on the DISC platform.

## 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 GLS are in accordance with the National Archives and Records Administration (NARA), RD Records Management policy [2033-A](#) and any applicable 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, GLS follows data retention as provided by the RD Records Management policy, 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.**

GLD data retention has the potential risk of unauthorized access, unauthorized disclosure or illegal use of the customer PII data.

GLS data is protected by DISC, which follows USDA federal agency requirements for data protection. DISC is accredited by FedRAMP. GLS components are hosted within the DISC Mainframe and Midrange environments. GLS follows 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?**

GLS is an integrated system with several modules that interface to other internal RD applications facilitating RD management of loan obligations, servicing, and loss claims. GLS resides on the RD intranet and authorized RD staff use eAuthentication to identify and authenticate before accessing GLS.

GLS interfaces with Commercial Loan Servicing System (CLSS), Program Funds Control System (PFCS), Automated Mail Processing (AMP), Business Intelligence (BI) Tabular Data Warehouse (TDW), Common Call Components (CCC) – Electronic Customer File (ECF) and Imaging, eServices (Account Cross Reference), New Loan Originations – Guaranteed Underwriting System (GUS), Farm Loan Accounting and Allotments System (FLAAS) - Program Loan Accounting System (PLAS), and Security Management – Authorization Authentication Security Module (AASM).

CLSS tracks and services the RD's commercial direct loan and grant programs for electric, telephone, distance learning, broadband, cable television, water and environmental and community facilities to process obligations, loans, grants and payment for RD customers. CLSS creates general ledger transactions from Rural Loan Servicing (RLS) transactions and send them to PLAS on a weekly basis.

PFCS consolidate and provides tools to support the budgetary controls of loan-related funds for multiple loan programs at the Farm Servicing Agency (FSA) and RD. GLS sends borrowers' full names and borrower IDs via service calls for specific loan transactions.

AMP is an enterprise print and mail handling services that produces loan servicing and customer notification correspondence. GLS sends customer information, such as full name and loan account information, via Mail Run Data File (MRDF) through SFTP to AMP to allow for the printing of customer loan statements and tax forms.

BI TDW provides business data used to ensure loans and grants are provided in rural areas of greatest economic need. GLS send data for data analysis reports that assist RD management in making business decision for RD customers on a nightly basis.

CCC ECF/Imaging receives documents via web services that are uploaded into the GLS application by lenders and serves as the document repository for GLS. These documents contain PII data of borrowers, including their full names, contact information, and financial account information. ECF/Imaging provides GLS loan information storage and retrieval of lender status reports and loan closing documents when a disbursement occurs.

eServices contain Account Cross Reference (ACR), which is a secure web service that provides masking and/or unmasking of Borrower Identification numbers (IDs) through a common data store (TDW). A data request is made to ACR to perform a lookup in TDW for payments made by borrowers on their loan obligations.

New Loan Originations provides legacy GLS a streamlined and automated application process, automated credit decision-making, and eligibility determinations for the Single-Family Housing (SFH) guaranteed rural housing loan program in read only form. The approved lender may either manually enter loan data, such as the loan number, borrower's information, and lender information, on each GUS application page, or import files from their loan origination system directly into GUS.

The Farm Loan Account and Allotments System (FLAAS) contains the Program Loan Accounting System (PLAS), which supports the loan/grant making, servicing, General Ledger and reporting requirements for program areas. GLS sends cash tracking and general loan ledger information, which includes Borrower's PII data, to PLAS monthly via SFTP. An ISA between USDA GLS and FLAAS is in effect for this data exchange.

Security Management's Authorization Authentication Security Module (AASM) is the database that contains lender information and the level 2 eAuth user ID numbers of all-lender employees authorized to participate in electronic reporting. These users create a user profile in the AASM system via a hyperlink from the public facing GLS modules. No PII is shared between the systems.

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

The information within the GLS applications is transmitted using HyperText Transfer Protocol Secure (HTTPS). The information that is shared internally is within the USDA network using DISC's technical protections in place to protect the data with security and privacy protections.



#### **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.**

Privacy risks include the potential compromise of PII data with GLS.

The risk associated with sharing of data is minimal, as access to the data is controlled by designated administrators, utilizing eAuthentication to identify and authenticate the users, and audit logs of user activity. In addition, the privacy risk is mitigated by the DISC midrange and mainframe, which host GLS applications and provides security and privacy data protection and complies with USDA requirements on protecting information.

### **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?**

GLS is sending loan data information, such as the borrower's full name, loan account number, address information, lender name/address, and financial information, to Ginnie Mae monthly via zipped files using WinZip Advanced Encryption Standard (AES)-256 encryption. The purpose of the exchange is to assist Ginnie Mae in their purchase of mortgage back securities. An Interconnection Security Agreement (ISA) expired between USDA GLS and Ginnie Mae on January 28, 2021.

GLS sends guarantee loan information, such as the borrowers' full name, lender names, addresses, date of reports, account number, TINs, amount of outstanding debt, type of debt, initiation date of debt, and maturity date, to Dun & Bradstreet monthly via Single File Transfer Protocol (SFTP) to comply with the requirements of the Fair Credit and Reporting Act.. An ISA is in effect for the data exchange between USDA GLS and Dun & Bradstreet, signed November 13, 2020.

GLS receives guaranteed loan information, such as the lender name, lender TIN, loan number, full name of the borrower, SSN, and property location from Black Knight Service Technologies, LLC, via Electronic Data Interchange (EDI) X12 files through SFTP over Transmission Control Protocol (TCP).

GLS sends loan account information, such as the borrowers' full names, lender names, addresses, account number, TINs, and amount of outstanding debt, to the U.S. Department of Treasury Fiscal Service Treasury Web Application Infrastructure

(TWAI) via direct connection with a single file transfer protocol (SFTP). An ISA between USDA RD and TWAI is in effect for this data exchange.

GLS sends data files to the Experian Credit Bureau for the purpose of providing credit bureau reporting on individuals with Farm Servicing Agency (FSA) guaranteed loans. GLS sends the borrower’s name, SSN, address, and account information to Experian each month via SFTP to the Experian server. An ISA between GLS and Experian is in effect for this data exchange

**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, System of Record Notice (SORN) USDA/Rural Development 1, *Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs* covers the routine use of this information with the external trusted sources described in section 5.1.

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

GLS requires an Interconnection Security Agreement (ISA) or Memorandum of Understanding (MOU) agreement for all external connections. Each ISA details the security measures and protections utilized to safeguard the information resources involved in the connection between GLS and the specific external organization.

Data is sent to Ginnie Mae monthly via zipped files using WinZip AES-256 encryption

Data is sent to Bulk Data Exchange System (BDES) / Dun & Bradstreet via direct connection through HTTPS protocol.

Data is sent to the Experian Credit Bureau monthly via SFTP connection.

Data is received from Black Knight Technologies via EDI X12 files through SFTP.

Data is sent to the Fiscal Service Treasury Web Application Infrastructure (TWAI) Department of Treasury - U. S. Department of Treasury via SFTP.

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

Privacy risks include the potential compromise of PII and sensitive financial information. This is mitigated by the security protections, such as firewalls, DNSSec, encryption of data in transit, and DISC audit logs. Authorized RD staff access GLS using eAuth and RD has continuous monitoring from DISC in compliance with FISMA and as required by RD and USDA. GLS data is stored in a secure environment on the DISC platform. Each data exchange with the external organization is governed by an Interconnection Security Agreement that governs the security practices and controls utilized to protect the information resources involved in the connection between the particular external organization and USDA GLS.

## 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, the system is covered by SORN USDA/RD-1, *Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs*: <https://www.govinfo.gov/content/pkg/FR-2019-05-14/pdf/2019-09874.pdf>.

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

Yes, notice was provided to the individual prior to the collection of information through the use of Form RD 410-9, Statement Required by the Privacy Act, which is provided before a RD applicant applies for a GLS loan or grant.

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

Individuals have the opportunity and/or right to decline to provide information, but if they decline, then they will not be able to apply for the GLS loan or grant. With the RD Form 410-9, Statement Required by the Privacy Act, individuals agree to provide the information, so RD applicants are aware of the collection of personal information.

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

Individuals are provided RD Form 410-9, *Statement Required by the Privacy Act*, to acknowledge and consent to the particular users of information. The RD applicant

consents to the collection of personal information for the purpose of applying for a GLS loan or grant and assist in the application processing.

**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.**

RD applicants consent to providing information for the completion of GLS loan and grant requirements. RD applicants are notified with the privacy form, RD Form 410-9, when they apply for loans or grants and consent to the use of their data before applying for the GLS loan or grant. Additionally, notice of the purposes and uses for the collection of the information is provided in the USDA GLS through the receipt and individual signed acknowledgment of Form 410-9 prior to information collection.

Risks associated with individuals being unaware of the collection are mitigated because RD individual applicants must consent to the use of their data and this notification is included in the privacy form that is completed as part of the process for applying for GLS loans and grants with RD.

## 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?**

The public (RD borrowers) does not have direct access to GLS. Borrower information is entered manually into the application by authorized GLS users (USDA personnel and lending institutions).

Individuals can reach out to authorized RD system users and trusted lenders that have access to their information. Applicants can contact RD authorized users that have access to borrower information. That staff member will keep the applicant informed as to the status of their GLS grant or loan application.

Individuals are notified of the procedure to gain access to their information in the Record Access Procedures section as outlined in the SORN RD-1. Record Access Procedures: Any individual may request information regarding this system of records or determine whether the system contains records pertaining to him/her, from the appropriate System Manager. If the specific location of the record is not known, the individual should address his or her request to:

Rural Development, Freedom of information Officer  
United States Department of Agriculture  
1400 Independence Avenue SW, Stop 0742  
Washington, DC 20250–0742.

A request for information pertaining to an individual must include a name; an address; the RD office where the loan or grant was applied for, approved, and/ or denied; the type of RD program; and the date of the request or approval.

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

The public does not have direct access to GLS. If an applicant notices inaccurate information with their GLS loan or grant application, then they will contact the RD area specialist for correction of any erroneous information. The RD area specialist will facilitate the correction of any inaccurate information for the RD applicant.

Individuals are notified of the procedure to gain access to and contest their information in the Record Access Procedures section as outlined in the SORN RD-1. See Record Access Procedures information in 7.1. Customers and employees may also contact:

USDA Rural Development Primary FOIA Contact Information:  
Lolita Barnes FOIA Liaison  
1400 Independence Ave., SW  
Washington, DC 20250  
Tel. 202-692-0004  
Email: lolita.barnes@usda.gov

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

The public does not have direct access to GLS. Notification is part of the application process for GLS loan and grant applications, so the borrower/applicant (individual) can contact the RD area specialist to correct any inaccurate information. Also, RD area specialists involved in processing the loan or grant application do manual review and will contact the applicant for any information corrections with their GLS loan or grant application.

Individuals are notified of the procedure to gain access to and contest their information in the Record Access Procedures section as outlined in the SORN RD-1.

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

Individuals are notified of the procedure to gain access to and contest their information in the Record Access Procedures section as outlined in the SORN RD-1.

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

Privacy risks associated with redress available to individuals are compromise of PII data involved in the redress activity.

This is mitigated by RD staff acting as responsible data stewards of the RD applicant's information and from the network security protections in place for GLS on the DISC mainframe/midrange. Any redress information with GLS is protected in accordance with RD policy, which follows USDA security and privacy protections as provided by Office of Management and Budget (OMB) and USDA policy. Individuals may also refer to the RD-1 SORN for additional information regarding Record Access Procedures.

## 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 GLS. The group and account types are defined by the System Owner for GLS applications. 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, RD contractors, and RD trusted partners (lenders) access GLS after being provisioned by a User Access Management (UAM) ticket, created by the System POC and completed by the UAM Team (UAMT). Access is granted via eAuthentication.

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

**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.

**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 GLS.

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

Yes, GLS has an Authorization to Operate (ATO), which is active until February 19, 2023.

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

GLS 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. GLS is hosted on the DISC mainframe and midrange environments at USDA, which are FedRAMP certified and follow USDA security and privacy requirements.

Access to GLS is granted via eAuthentication once the UAM completes the proper provisioning. Section 5 of this PIA describes security protections in place for GLS data.

**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 GLS is used by authorized RD staff using eAuthentication 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 GLS on the DISC platform.

## 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?**

This project is part of the Comprehensive Loan Program (CLP) Investment, which facilitates the processing by USDA personnel of applications, obligations, loans, grants, and collections on behalf of RD Commercial Program customers.

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 GLS and these technology choices do not raise privacy concerns. GLS is hosted on the DISC platform at USDA.

**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 3<sup>rd</sup> party websites and/or applications?**

Not applicable, GLS does not use 3rd party websites and/or applications.

**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.**

Not applicable, GLS does not use 3rd party websites and/or applications.

**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?**



Not applicable, GLS does not use 3rd party websites and/or applications.

**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?**

Not applicable, GLS does not use 3rd party websites and/or applications.

**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?**

Not applicable, GLS does 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 3<sup>rd</sup> party websites and/or applications?**

Not applicable, GLS does not use 3rd party websites and/or applications.

**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?**

Not applicable, GLS does 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 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

Not applicable, GLS does not use 3rd party websites and/or applications.

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

Not applicable, GLS does 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, GLS does 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 3<sup>rd</sup> party websites**

**and/or applications, discuss the privacy risks identified and how they were mitigated.**

Not applicable, GLS does not use web measurement and customization technology.

## Agency Responsible Officials

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## Agency Approval Signature

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