

Privacy Impact Assessment LoanServ

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the LoanServ

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Abstract

LoanServ is used to provide loan servicing and support for rural housing SFH (Single Family Home) direct loans and grants, including delinquency servicing and risk management. It also provides the interfaces to taxing authorities, insurance providers, credit bureaus, the U.S. Department of Treasury for the Treasury Offset Program and Cross Servicing for Guaranteed Loss Claims for required financial reporting. This PIA is required because there is PII data in LoanServ with the Defense Logistics Agency Transaction Services Electronic Data Interchange (DLATS EDI) and Call Pegging (CallPeg) components and the PTA determined that a PIA is required.

Overview

LoanServ provides loan servicing and support for rural housing SFH direct loans and grants, including delinquency servicing and risk management. LoanServ also provides the interfaces to taxing authorities, insurance providers, credit bureaus, the U.S. Department of Treasury for the Treasury Offset Program and Cross Servicing for Guaranteed Loss Claims. Both DLATS EDI and CallPeg are LoanServ components.

DLATS EDI provides bankruptcy notices electronically to CSC. The DLATS mailbox pushes the electronic bankruptcy notices using secure file transfer protocol (SFTP) server in the X-12 format. The notices are created by a flat file and then sent via SFTP to a CSC server.

CallPeg is an application designed to provide CSC with a tool to capture reasons customers contact the Call Center. Some of the data captured includes an account number, reason for the call, representative answering the phone, date and time along with some current account data, such as customer delinquency. RD uses this information to study the call activity and to improve the quality of customer service provided. CallPeg is hosted on the NITC platform.

LoanServ is hosted on the NITC mainframe, DLATS EDI is hosted by CEC and CallPeg is hosted on the NITC platform. Authorized RD staff use ACF2 to authenticate to the NITC mainframe.

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?

LoanServ collects borrower and co-borrower names, social security numbers, phone numbers, addresses, financial data, repayment information, and tax and hazard insurance information.



This information is collected for loan servicing and support for SFH direct loans and grants for rural customers. LoanServ is hosted on the NITC mainframe, so information used with LoanServ gets security protections from NITC.

DLATS EDI shares electronic bankruptcy notices with a CSC server using SFTP. The notices are created by a flat file and then sent via SFTP to a CSC server. CEC hosts DLATS EDI.

CallPeg collects the customer name and miscellaneous identification numbers, such as agency assigned number, case number, accounts or permits. Devlmax is a tracking tool used to issue a log number, when a State or Field office calls or sends an inquiry to the CSB/Field Assistance Desk. These logs are tracked and notes are associated within Global/Notes on the Borrower account, so the Field/State can track the inquiry request and Field Assistance Desk can track the inquiry and provide monthly reports to the National Office. CallPeg is hosted on the NITC platform and used to enhance the customer service for rural customers.

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

LoanServ receives closing documentation for the SFH direct loans and grants, phone and personal interviews, and correspondence from UniFi (an internal RD application), which is the loan origination system.

DLATS EDI has a mailbox that pushes the electronic bankruptcy notices to NITC using SFTP. The bankruptcy notices are created by a flat file and sent using secure file transfer protocol (SFTP) to a CSC server.

CallPeg gets its information internally from customer calls and is tracked internally and hosted on the NITC platform.

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

LoanServ information is collected, used, disseminated or maintained for servicing RD direct loans and grants, the payment of taxes and insurance bills on the RD property and for reporting payment history to the credit bureaus to meet financial compliance requirements. LoanServ services the SFH direct loans and grants for rural customers.

DLATS EDI shares the bankruptcy notices for SFH loans with CSC using the secure file transfer protocol.

CallPeg information is used to collect information regarding calls to the call center to enhance the RD customer experience by providing management with useful data to improve this business process.

1.4 How is the information collected?

LoanServ information is collected from UniFi with an upload that contains closing documentation for the SFH direct loans and grants, phone and personal interviews, and RD correspondence.

The DLATS EDI mailbox pushes the electronic bankruptcy notices to the NITC Midrange SFTP server in the X-12 format. The notices are created by a flat file and then sent using secure file transfer protocol (SFTP) to a CSC server.

CallPeg information is collected from RD customers who call RD staff for assistance. The authorized RD staff member records the account number, reason for the call, representative answering the phone, date and time along with some current account data, such as customer delinquency. RD uses this information to study the call activity and to improve the RD customer experience with enhanced business processes.

1.5 How will the information be checked for accuracy?

The data is verified by authorized RD staff with regular review and verification as part of the normal workflow for LoanServ. Authorized RD Staff routinely review the information to ensure its accuracy as part of the normal workflow for LoanServ. RD applicants/customers can contact authorized RD staff for LoanServ to make necessary corrections to RD customer or applicant data that is not accurate. Data integrity controls protect the data from accidental or malicious alteration or destruction and provide assurance that the data is valid.

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

Information in LoanServ falls 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*
- *The Fair Debt Collection Practices Act, Pub. L 111-203, title X, 124, Stat. 2092 (2010)*
- *7 CFR, section 3560, subsections 55 and 154*
- *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.

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 LoanServ system owner defines access roles to ensure separation of duties, account management and authorized access to data and information in LoanServ, which is hosted on the NITC mainframe, DLATS EDI is hosted by CEC and CallPeg is hosted on the NITC platform. Only authorized RD staff can access the LoanServ application using ACF2 authentication. These measures mitigate the risks to privacy data in LoanServ. Since LoanServ is hosted on the NITC mainframe and platform and by CEC, both NITC and CEC comply 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.

LoanServ information is used to process Single Family Housing (SFH) direct loans and grants. This processing includes payment application, delinquency processing, automated escrow account processing and required financial reporting to credit bureaus and Treasury. Calls from RD customers are used for trend analysis to improve the customer relationship for calls made to the call center.

The DLATS EDI mailbox pushes the electronic bankruptcy notices to the NITC Midrange SFTP server in the X-12 format. The notices are created by a flat file and then sent using secure file transfer protocol (SFTP) to a CSC server.

CallPeg information is collected from RD customers who call RD staff for assistance. The authorized RD staff member records the account number, reason for the call, representative answering the phone, date and time along with some current account data, such as customer delinquency. RD uses this information to study the call activity and to improve the RD customer experience with enhanced business processes.

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

Authorized RD staff manually review Loan Serv, DLATS EDI and CallPeg information to ensure that SFH direct loan and grant 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, LoanServ 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 LoanServ, DLATS EDI and CallPeg information include NITC audit logs/security logs and CEC audit logs. There are logs for ACF2, which is how the authorized RD staff identify and authenticate to access LoanServ on the NITC Mainframe.

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?

LoanServ information is retained 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, LoanServ follows 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.



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

LoanServ data is protected by NITC and CEC, which follow USDA federal agency requirements for data protection. NITC is accredited by FedRAMP. LoanServ is hosted on the NITC mainframe. DLATS EDI is physically located in the Client Experience Center (CEC) End User Computing environment. All of the CallPeg software modules are located within the NITC Data Center. LoanServ 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?

LoanServ has the following internal information sharing with the following internal RD applications:

New Loan Originations uses UniFi to update application information for LoanServ.

Automated Mail Processing (AMP) prints statements and tax forms for LoanServ.

Business Intelligence (BI) uses FOCUS and Tabular Data Warehouse (TDW), which provide reports to both LoanServ and DLATS EDI.

Program Funds Control System (PFCS) provides loan funds distribution to LoanServ.

Common Call Component provides LoanServ loan information storage and retrieval.

eServices uses NowChecks to retrieve Escrow disbursement files for LoanServ.

CLP Support Admin uses MortgageLink to provide links to LoanServ.

Program Loan Accounting System (PLAS) is the accounting system providing transaction processing to LoanServ.

CallPeg receives the account number and customer name from LoanServ.

4.2 How is the information transmitted or disclosed?

New Loan Originations, AMP, BI, PFCS, Common Call Component, eServices, CLP Support Admin, PLAS, and CallPeg share information internally with LoanServ within the USDA network using NITC'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.

The privacy risk is the unauthorized access and potential compromise of PII data in LoanServ. This privacy risk is mitigated by the NITC mainframe, which hosts LoanServ and provides security and privacy data protection and complies with USDA requirements on protecting information. Also, only authorized RD staff access LoanServ using ACF2, so there are audit logs on this activity.

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?

LoanServ shares information with the following external organizations:

CBC Innovis Credit Bureau provides monthly credit bureau information to LoanServ to comply with the Fair Credit Reporting Act (FCRA).

Corelogic Web Portal processes billing information for the real estate taxing for several mortgage companies in a single file for LoanServ.

FiServ: Hazard EDI routes data files received from the designated hazard insurance carriers to a proprietary third-party EDI translation application that converts each file back to the LoanServ hazard insurance format.

Experian Credit Bureau: LoanServ provides the monthly file FCRA transmitted to Experian for collection and distribution as required for financial compliance. Data files are transferred from LoanServ, CLSS and GLS to Experian for credit bureau reporting.

Express Payment Money Gram allows customers to make urgent payments or pay routine bills through MoneyGram's network to certain creditors for LoanServ.

Fiscal Service Treasury Web Application Infrastructure (TWAI), Department of Treasury provides debtor and debt information for Treasury Offset Program and Cross Servicing processing to LoanServ.

Global Exchange Services: DLA Tran-Serv GEX provides a daily file containing federal bankruptcy Chapter 12 data to LoanServ.

Veterans Administration provides processing and oversight of RD's Real Estate Owned (REO) Properties for LoanServ.

Proctor EDI provides hazard insurance to RD borrowers.



Bank of America has Escrow disbursement account information transmitted with an Online File Transfer to LoanServ.

TransUnion Credit Bureau: LoanServ provides the monthly FCRA file transmitted to TransUnion for collection and distribution as required for financial compliance.

US Bank provides lockbox services for the LoanServ's direct single-family housing loan customers.

Western Union Walk-in Cash Payments allows RD consumers to make urgent payments or pay routine bills through the network to certain creditors for LoanServ.

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 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?

LoanServ requires an Interconnection Service Agreement (ISA) or Memorandum of Understanding (MOU) for all external connections.

CBC Innovis returns a credit report from an API call to the securecreditbureau.com portal over HTTPS with files being transferred over Connect Direct using SSL for encryption.

Corelogic Web Portal transmits data files using Commerce's Connect Direct over IP with Security plus for encryption.

FiServ uses PGP encryption to dedicated FTP Servers for State Farm Insurance, Farmers Insurance and Travelers Insurance. FiServ also provides a DMZ server using a password secured connection to Allstate Insurance, American Family Insurance and Nationwide Insurance.

LoanServ provides a monthly file, FiServ Credit Bureau Report, to Experian Credit Bureau transferred using HTTPS via SSL.

Express Payment MoneyGram creates a payment posting file and puts it on their FTP server (encrypted and zipped). All data files sent to the NITC mainframe use PKWARE and AES 256 encryption. USDA logs into the MoneyGram server using UserID and password, decrypts it and puts it on the NITC mainframe. A UserID and password is needed to retrieve this file. After USDA retrieves this file, MoneyGram deletes it from their mailbox.



Fiscal Service Treasury Web Application Infrastructure (TWA) with the Department of Treasury uses Connect Direct without SecurePlus for a proprietary file transfer protocol (TCP ports 1364 and 1372).

DLA Transaction Services GEX (Global Exchange Services) provides a daily file containing federal bankruptcy Chapter 12 data to USDA using SFTP to a Linux server.

Veterans Administration transfers account identification number and property, account, sale and expense information. The interconnection between RD LoanServ and the VA is for the express purpose of exchanging REO property and sale information used to manage and track the sale of RD REO property information maintained by VA and RD LoanServ.

Proctor EDI does a mainframe to mainframe file transfer over VPN.

Escrow disbursement account information is transmitted to Bank of America via Online File Transfer via HTTPS.

All information transferred from LoanServ to TransUnion Credit Bureau is sent using SSL, which is one-directional with RD individual logon to the TransUnion FTP server. No direct connection between LoanServ and TransUnion is established.

US Bank transfers STOP files using HTTPS and secure socket layer for encryption

Western Union creates a zip file to upload to their SFTP server, USDA retrieves this file via specific IP address with unique UserID and password. Once the file is retrieved, USDA deletes the file from the mainframe. Western Union retains the file on their server for 14 days after which it is automatically deleted.

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 NITC audit logs. Authorized RD staff access LoanServ using ACF2 and RD has continuous monitoring from NITC in compliance with FISMA and as required by RD and USDA. LoanServ data is stored in a secure environment on the NITC platform.

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 it is an internal application on the NITC mainframe, so it is not accessible by the general public.

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

Not applicable, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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

Not applicable, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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

Not applicable, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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

Not applicable, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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

Not applicable, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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, LoanServ is for authorized RD staff to use to process SFH direct loans and grants, so it is not gathering information directly from RD customers or applicants.

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 LoanServ. The group and account types are defined by the System Owner for the LoanServ. 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 LoanServ after being provisioned in ACF2 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 LoanServ.

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 LoanServ.

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

Yes, LoanServ has an ATO, which is in CSAM.

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

LoanServ 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. LoanServ is hosted on the NITC mainframe at USDA, which is FedRAMP certified and follows USDA security and privacy requirements.

Access to LoanServ is controlled through ACF2 authentication for authorized RD staff and access to sensitive information is controlled through NITC Profiles/Groups on a need-to-know basis with audit logs of user activity for LoanServ. Section 5 of this PIA describes security protections in place for LoanServ 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 LoanServ is used by authorized RD staff using ACF2 authentication and there are group access management controls, the privacy risks are minimal. Potential compromise of privacy data is mitigated by NITC audit event monitoring and USDA network security protections in place to protect RD data for LoanServ on the NITC mainframe.

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?

LoanServ information is used to process Single Family Housing (SFH) direct loans and grants. This processing includes payment application, delinquency processing, automated escrow account processing and required financial reporting to credit bureaus and Treasury. Calls from RD customers are used for trend analysis to improve the customer relationship for calls made to the call center.

The DLATS EDI mailbox pushes the electronic bankruptcy notices to the NITC Midrange SFTP server in the Chapter 12 format. The notices are created by a flat file and then sent using secure file transfer protocol (SFTP) to a CSC server.

CallPeg information is collected from RD customers who contact RD staff for assistance. The authorized RD staff member records the account number, reason for the call, representative answering the phone, date and time along with some current account data, such as customer delinquency. RD uses this information to study the call activity and to improve the RD customer experience with enhanced business processes.

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 LoanServ, and these technology choices do not raise privacy concerns. LoanServ is hosted on the NITC mainframe 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 3rd party websites and/or applications?

Not applicable, LoanServ does not use 3rd party websites 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, LoanServ does not use 3rd party websites 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, LoanServ does not use 3rd party websites 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, LoanServ does not use 3rd party websites 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, LoanServ does not use 3rd party websites 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, LoanServ does not use 3rd party websites 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, LoanServ does not use 3rd party websites 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, LoanServ does not use 3rd party websites or applications.

10.10 Does the system use web measurement and customization technology?

Not applicable, LoanServ 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, LoanServ 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 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

Not applicable, LoanServ does not use 3rd party websites or applications.



Responsible Officials

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