

Privacy Impact Assessment (PIA)

Customer Name and Address System

(CN/AS)

Customer Name and Address – MF, S/36
Service Center Information Management System (SCIMS)
SCOAP Mailings
County Office Newsletter (COF Newsletter)

Revision: 1.01



Farm Service Agency

Date: August 7, 2009

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Customer Name and Address System (CN/AS)

Document Information

| | Owner Details | |
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| Document Revision and History | | | | |
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| Revision | Date | Author | Comments | |
| 1.01 | 7/6/2009 | D. Brizendine ISO | Initial document | |
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| 1.03 | July 8, 2009 | J. Finke – ECS | Review and minor changes | |
| 1.04 | July 20, 2009 | D.Brizendine ISO | Updated System Owner Information | |
| 1.0 | August 7, 2009 | Sharon Lovelace | Approved. | |
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Date: August 7, 2009





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1 Purpose of Document

USDA DM 3515-002 states: "Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner's requirements presents any threats to privacy."

The Privacy Impact Assessment (PIA) document contains information on how the Customer Name and Address System affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.

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Customer Name and Address System (CN/AS)

2 System Information

| | System Information | |
|--|--|--|
| Agency: | Farm Service Agency | |
| System Name: | Customer Name/Address System | |
| System Type: | | |
| System Categorization (per FIPS 199): | ☐ High ☐ Moderate ☐ Low | |
| Description of System: | Customer Name/Address Systems (CN/AS) provides for the collection and maintenance of customer data for the FSA's legacy common customer information. It also contains some demographic data about customers. The information maintained by SCIMS (which is a component of CN/AS) provides a common data infrastructure for most FSA applications and an increasing number of NRCS and RD applications. In most cases these applications cannot operate unless SCIMS data is accessible. Information regarding disbursement of farm program payments and producer obligations to the government may be incomplete without SCIMS data. | |
| Who owns this system? (Name, agency, contact information) | Rebecka Gaskill (816) 926-1645 rebecka.gaskill@kcc.usda.gov | |
| Who is the security contact for this system? (Name, agency, contact information) | Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov | |
| Who completed this document? (Name, agency, contact information) | Sharon Lovelace - Chief, Farm Records Group Production Adjustment Risk Management Office USDA/FSA/ADC/PARMO/FRG (816) 926-2115 Sharon.Lovelace@kcc.usda.gov | |





Customer Name and Address System (CN/AS)

3 Data Information

3.1 Data Collection

| No. | Question | Response |
|-------|---|--|
| 1 | Generally describe the data to be used in the | Customer Name / Address (MF) |
| | system. | Customer: Name, gender, citizenship country, address, race, veteran status, receive mail option, limited resource producer status, resident alien status, birth date, marital status, voting district, language preference, ethnicity, disability information, and other basic information such as Social Security Number, Employer Identification Number, mailing address, email address, and phone numbers. Name & Address (MF) includes Farm Service Agency employees, farm owners, farm operators, and Technical Service Providers. Additionally business customers can be identified by business entity type (i.e. general partnership, Limited Liability Company, corporation, etc.) |
| na na | | Employee: Name, gender, citizenship country, address, race, veteran status, receive mail option, limited resource producer status, resident alien status, birth date, marital status, voting district, language preference, ethnicity, disability information, and other basic information such as Social Security Number, Employer Identification Number, mailing address, email address, and phone numbers. |
| | | Other: |
| | | Customer Name / Address (S/36) |
| | | Customer: Name, gender, citizenship country, address, race, veteran status, receive mail option, limited resource producer status, resident alien status, birth date, marital status, voting district, language preference, ethnicity, disability information, and other basic information such as Social Security Number, |





| | Employer Identification Number, mailing address, email address, and phone numbers. Name & Address(S/36) includes Farm Service Agency employees, farm owners, farm operators, and Technical Service Providers. Additionally business customers |
|--|--|
| | can be identified by business entity type (i.e. general partnership, Limited Liability Company, corporation, etc.) Employee: Name, gender, citizenship country, address, race, veteran status, receive mail option, limited resource producer status, resident alien status, birth date, marital status, voting district, language preference, ethnicity, disability information, and other basic information such as Social Security Number, Employer Identification Number, mailing address, email address, and phone numbers. Other: |
| | Service Center Information Management System (SCIMS): Customer and Employee data: Name, gender, citizenship country, address, race, veteran status, receive mail option, limited resource producer status, resident alien status, birth date, marital status, voting district, language preference, ethnicity, disability information, and other basic information such as Social Security Number, Employer Identification Number, mailing address, email address, and phone numbers. SCIMS includes Farm Service Agency employees, farm owners, farm operators, and Technical Service Providers. Additionally business customers can be identified by business entity type (i.e. |
| | |





| No. | Question | Response |
|-----|---|--|
| | | SCOAP Mailings: Customer, Employee: Name and address information for all customers in the legacy S/36 file for the applicable Service Center. Other: USPS Mailing Rates and Facilities information. |
| | | County Office Newsletter (COF Newsletter): Customer and Employee Data: Name, type, and address information in the SCIMS database for the designated state(s)/county (ies). |
| 2 | Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)? | ✓ Yes☐ No – If NO, go to question 3. |
| 2.1 | State the law or regulation that requires the collection of this information. | System software technology dependency required. 7 U.S.C. 135b, 450j, 450k, 405l, 1281-1393, 1421-1449, 1461-1469, 1471-1471i, 1781-1787; 15 U.S.C. 714-714p; 16 U.S.C. 590a-590q, 1301-1311, 1501-1510, 1606, 2101-2111, 2201-2205, 3501, 3801-3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469 |
| 3 | Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President. | ⊠ Yes □ No |
| 4 | Sources of the data in the system. | Customer Name / Address (MF): Farm Service Agency (FSA), Natural Resource Conservation Service (NRCS), Rural Development (RD). Original data was entered by County Office Employees IBM System 36 files. Ongoing data is entered by authorized USDA Service Center employees through SCIMS through S/36 files. |





| No. | Question | Response |
|-----|--|--|
| | , | Customer Name / Address (S/36): Farm Service Agency (FSA). Original data was entered by County Office Employees IBM System 36 files. Ongoing data is entered by authorized USDA Service Center employees through SCIMS. |
| | | Service Center Information Management System (SCIMS): |
| | | Farm Service Agency (FSA), Natural Resource Conservation Service (NRCS), and Rural Development (RD) Baseline data was migrated from FSA's legacy IBM System 36 files. Ongoing data is entered by authorized USDA Service Center employees. |
| | | SCOAP Mailings: |
| | | FSA, USPS, Name and Address information is retrieved from the S/36 Name and Address File, which is under the control of the SCIMS web system. USPS information comes from that organization. |
| | entre et aggregation de la companya | County Office Newsletter (COF Newsletter): |
| | | Farm Service Agency (FSA), The customer repository maintained by the Service Center Information Management System (SCIMS) application. |
| 4.1 | What data is being collected from the | Customer Name / Address (MF – S/36): |
| | customer? | Name & Address, Tax ID & Type, Ethnicity, Race. |
| | | Service Center Information Management System (SCIMS): |
| | | Name, gender, citizenship country, address, race, veteran status, receive mail option, limited resource producer status, resident alien |





| No. | Question | Response |
|-----|---|---|
| | | status, birth date, marital status, voting district, language preference, ethnicity, disability information, and other basic information such as Social Security Number, Employer Identification Number, mailing address, e-mail address, and phone numbers |
| | | SCOAP Mailings: |
| | | Transactional information about date of mailing, mailpiece content, desired mailing option, etc. |
| | | County Office Newsletter (COF Newsletter): |
| | | State(s) and/or county (ies) to use in selecting data. |
| 4.2 | What USDA agencies are providing data for | Customer Name / Address (MF - S/36): |
| | use in the system? | Customer Name/Address. FSA is the source agency. |
| | | Service Center Information Management System (SCIMS): |
| | tion of the state | Same as 2a Farm Service Agency is the source agency. |
| | · | SCOAP Mailings: |
| | | S/36 Name and Address file. |
| | | County Office Newsletter (COF Newsletter): |
| | | Service Center Information Management System (SCIMS) database. Farm Service Agency is the source agency. |
| 4.3 | What state and local agencies are providing data for use in the system? | None |





| No. | Question | Response |
|-----|---|---|
| 4.4 | From what other third party sources is data being collected? | Customer Name / Address (MF – S/36): None |
| | | Service Center Information Management System (SCIMS): |
| | | Technical service providers |
| | | SCOAP Mailings: |
| | | None |
| | | County Office Newsletter (COF Newsletter): |
| | | None currently |
| 5 | Will data be collected from sources outside your agency? For example, customers, USDA | ✓ Yes✓ No – If NO, go to question 6. |
| | sources (i.e., NFC, RD, etc.) or Non-USDA sources. | |
| 5.1 | How will the data collected from customers be | Customer Name / Address (MF – S/36): |
| | verified for accuracy, relevance, timeliness, and completeness? | Employees input data and data is automatically updated from SCIMS and Subsidiary. |
| · | | Service Center Information Management System (SCIMS): |
| | | System web links and business rule/software validations. |
| | | SCOAP Mailings: |
| | | USPS information is nationally published. |
| | | County Office Newsletter (COF Newsletter): |
| | | There is no data collected. |





| No. | Question | Response |
|-----|--|--|
| 5.2 | How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness? | Customer Name / Address (MF – S/36): N/A |
| | | Service Center Information Management System (SCIMS): |
| | | System web links and business rule/software validations. |
| ; | | SCOAP Mailings: |
| | | USPS information is nationally published. |
| | | County Office Newsletter (COF Newsletter): N/A |
| 5.3 | How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness? | Customer Name / Address (MF – S/36): Business rule/software validations. |
| | | Service Center Information Management System (SCIMS): |
| | | System web links and business rule/software validations. |
| | | SCOAP Mailings: |
| | | USPS information is nationally published. |
| | | County Office Newsletter (COF Newsletter): N/A |
| | | |
| | | |
| | | |
| | | |
| | | |





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3.2 Data Use

| No. | Question | Response |
|---|---|--|
| 6 | Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected? | Customer Name / Address (MF – S/36): Data will be used to perform administrative and programmatic business in USDA Service Centers. |
| | | Service Center Information Management System (SCIMS): Data will be used to perform administrative and programmatic business in USDA Service |
| | | Centers. |
| | | SCOAP Mailings: |
| | | No data is collected. |
| | | County Office Newsletter (COF Newsletter): |
| | | No data is collected. |
| 7 | Will the data be used for any other purpose? | ☐ Yes ☐ No – If NO, go to question 8. |
| 7.1 | What are the other purposes? | N/A |
| 8 | Is the use of the data both relevant and | ⊠ Yes |
| | necessary to the purpose for which the system is being designed? In other words, the data is | No AME SIZO |
| | absolutely needed and has significant and | Customer Name / Address (MF – S/36): |
| | demonstrable bearing on the system's purpose as required by statute or by Executive order of the President | Yes, SSN and Tax ID are the key to the identification of individuals and entities. |
| 777 | the President | Service Center Information Management System (SCIMS): |
| | | Yes |
| | | SCOAP Mailings: |
| | | Yes |
| *************************************** | | County Office Newsletter (COF Newsletter): |
| | | Yes |





| No. | Question | Response |
|------|---|---|
| 9 | Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)? | ☐ Yes ☐ No – If NO, go to question 10. |
| 9.1 | Will the new data be placed in the individual's record (customer or employee)? | ☐ Yes ☐ No |
| 9.2 | Can the system make determinations about customers or employees that would not be possible without the new data? | ☐ Yes ☐ No |
| 9.3 | How will the new data be verified for relevance and accuracy? | N/A |
| 10 | Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected? | Data will be used to perform administrative and programmatic business in USDA Service Centers. |
| 11 | Will the data be used for any other uses (routine or otherwise)? | ☐ Yes ☐ No – If NO, go to question 12. |
| 11.1 | What are the other uses? | N/A |
| 12 | Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated? | ☐ Yes (SCIMS only) ☐ No – If NO, go to question 13. Customer Name / Address (MF – S/36): No consolidation Service Center Information Management System (SCIMS): N/A |
| | | SCOAP Mailings: No consolidation County Office Newsletter (COF Newsletter): No consolidation |
| 12.1 | What controls are in place to protect the data and prevent unauthorized access? | N/A |





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| No. | Question | Response |
|------|---|--|
| 13 | Are processes being consolidated? | ☐ Yes (SCIMS only) |
| | | No − If NO, go to question 14. |
| | | Customer Name / Address (MF – S/36): |
| | | No consolidation |
| | | Service Center Information Management System (SCIMS): |
| | | N/A |
| | | |
| | | SCOAP Mailings: |
| | | No consolidation |
| | | |
| | | County Office Newsletter (COF Newsletter): |
| | | No consolidation |
| 13.1 | What controls are in place to protect the data and prevent unauthorized access? | N/A |

3.3 Data Retention

| No. | Question | Response |
|-----|--|--|
| 14 | Is the data periodically purged from the | ☐ Yes |
| | system? | No − If NO, go to question 15. |
| | | Customer Name / Address (MF): |
| | | All data is kept on an active database. |
| | | Customer Name / Address (S/36): |
| | | All data is kept in active files. |
| | | Service Center Information Management System (SCIMS): |
| | | Indefinite |
| 1 | | SCOAP Mailings: Indefinite |
| | | County Office Newsletter (COF Newsletter): Indefinite. |





| No. | Question | Response |
|---------------------------------------|--|--|
| 14.1 | How long is the data retained whether it is on paper, electronic, in the system or in a backup? | |
| 14.2 | What are the procedures for purging the data at the end of the retention period? | Customer Name / Address (MF – S/36): File archiving procedures are covered in policy and operations manuals. |
| | | Service Center Information Management System (SCIMS): |
| | | Procedure is in place for inactivating applicable files. |
| | | SCOAP Mailings: N/A |
| | | County Office Newsletter (COF Newsletter): N/A |
| 14.3 | Where are these procedures documented? | Customer Name / Address (MF – S/36): File archiving procedures are covered in policy and operations manuals. |
| . 2 | ting and the second of the sec | Service Center Information Management System (SCIMS): |
| | | Procedure is in place for inactivating applicable files. |
| | | SCOAP Mailings: N/A |
| T T T T T T T T T T T T T T T T T T T | | County Office Newsletter (COF Newsletter): N/A |





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| No. | Question | Response |
|-----|---|--|
| 15 | While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, | Customer Name / Address (MF - S/36): Compliance checks, audits. |
| | and complete to ensure fairness in making determinations? | Service Center Information Management System (SCIMS): |
| | | Software and data are updated as necessary and as dictated by law. |
| | | SCOAP Mailings: |
| | · | Postal mailing data is not used to make determinations. |
| | | County Office Newsletter (COF Newsletter): |
| i | | Information is not used to make determinations. |
| 16 | Is the data retained in the system the minimum necessary for the proper performance of a documented agency function? | ∑ Yes □ No |

3.4 Data Sharing

| No. | Question | Response |
|-----|---|---|
| 17 | Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)? | Yes No – If NO, go to question 18. Customer Name / Address (MF – S/36): No. |
| | | Service Center Information Management System (SCIMS): Only USDA Service Center Agencies previously noted (FSA, NRCS, RD) |
| | | SCOAP Mailings: No |
| | | County Office Newsletter (COF Newsletter): No |





| No. | Question | Response |
|---------------------------|--|--|
| 17.1 | How will the data be used by the other agency? | Customer Name / Address (MF – S/36): N/A. |
| | | Service Center Information Management System (SCIMS): |
| | | Data will be used to perform administrative and programmatic business in USDA Service Centers. |
| | | SCOAP Mailings: |
| | | N/A |
| | | County Office Newsletter (COF Newsletter): |
| | | N/A |
| 17.2 | Who is responsible for assuring the other | Customer Name / Address (MF – S/36): |
| | agency properly uses the data? | WDC Procedure, Emergency and Compliance Division (PECD). |
| | | Service Center Information Management System (SCIMS): |
| | | In addition to established SCIMS Security |
| ira makaza dang Marana | And the second s | Officers, managers for respective USDA Service Center agencies are held accountable. |
| | | Service Center agencies are new accountable. |
| | | SCOAP Mailings: |
| | | Service Center Employees |
| | | County Office Newsletter (COF Newsletter): |
| | | FSA/DAM/MSD |
| 18 | Is the data transmitted to another agency or an independent site? | ✓ Yes☐ No – If NO, go to question 19. |
| 18.1 | Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected? | Yes |





| No. | Question | Response |
|-----------------|--|--|
| 19 | Is the system operated in more than one site? | ⊠ Yes |
| | | ☐ No – If NO, go to question 20. |
| | | Customer Name / Address (MF): |
| | | The system is only operated in one place. |
| | | Customer Name / Address (S/36): |
| | | Same system software is used and software releases are controlled through the Kansas City office. |
| | | Service Center Information Management System (SCIMS): |
| | | While the system may be accessed in multiple locations, all processing and data storage occurs in one site. |
| | | SCOAP Mailings: |
| | | Transactional data about a postal mailing is generated and retained only through the certified and versioned software distributed to and installed on S/36 systems in County Offices. |
| فوهنسته دماريان | gaganina in no an innamento of Educação Denim por in the solet of the entre of the interest of the solet of t | ing and a second control of the second secon |
| | | County Office Newsletter (COF Newsletter): |
| | | The system may be accessed in multiple locations. |





Customer Name and Address System (CN/AS)

| No. | Question | Response |
|------|--|---|
| 19.1 | How will consistent use of the system and data be maintained in all sites? | Customer Name / Address (MF): The system is only operated in one place. |
| | of mamamod man ones. | The system is only operated in one place. |
| | | Customer Name / Address (S/36): |
| | | Same system software is used and software releases are controlled through the Kansas City office. Separate file in each location. |
| | | Service Center Information Management System (SCIMS): |
| | | While the system may be accessed in multiple locations, all processing and data storage occurs in one site. |
| | | SCOAP Mailings: |
| | | Transactional data about a postal mailing is generated and retained only through the certified and versioned software distributed to and installed on S/36 systems in County Offices. |
| ş.cc | | County Office Newsletter (COF Newsletter): |
| | | N/A |

3.5 Data Access

Page 17

| No. | Question | Response |
|-----|----------|--|
| 20 | | Customer Name / Address (MF – S/36): Only authorized FSA Users, FSA System Administrators, and FSA Developers. |





| No. | Question | Response |
|-----|--|---|
| | | Service Center Information Management System (SCIMS): |
| | | Only authorized users who have been certified by respective agency's SCIMS Security Officer |
| | | SCOAP Mailings: |
| | | The system's development staff, authorized County Office FSA users. |
| | | County Office Newsletter (COF Newsletter): |
| | | Authorized users at the State Office. |
| 21 | How will user access to the data be | Customer Name / Address (MF): |
| | determined? | ACF security. Yes |
| | | Customer Name / Address (S/36): |
| | | FSA employee signon authorization. Yes |
| ; | | Service Center Information Management System (SCIMS): |
| | Sangara ya Bagan ganta () () () () () () () () () (| Same as #1 and user names and passwords are initially assigned by authorized technicians. |
| : | | Application permissions are determined by EAS Roles |
| | | SCOAP Mailings: |
| | i | Any authorized FSA System-36 user. |
| | | County Office Newsletter (COF Newsletter): |
| | | Users are designated by headquarters (FSA/DAM/MSD). |



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Privacy Impact Assessment for



| No. | Question | Response |
|------|---|--|
| 21.1 | Are criteria, procedures, controls, and responsibilities regarding user access documented? | |
| | | Customer Name / Address (S/36): FSA employee signon authorization. Yes |
| | | Service Center Information Management System (SCIMS): |
| | | User names and passwords are initially assigned by authorized technicians. |
| | | Application permissions are determined by EAS Roles |
| | · | SCOAP Mailings: |
| | | Any authorized FSA System-36 user. |
| , | | County Office Newsletter (COF Newsletter): |
| | e angan ang kalangan kalanggan yang menangan di kalangan yang kanangan kalangan berakan berakan berakan beraka Berakan kalangan kalangan kalangan kalangan kalangan kalangan berakan berakan berakan berakan berakan berakan | Users are designated by headquarters (FSA/DAM/MSD). |
| 22 | How will user access to the data be restricted? | Customer Name / Address (S/36): Users are authorized "full access" or "view only" access based on FSA employee signon authorization. |
| | | Service Center Information Management System (SCIMS): |
| | | Users are authorized "full access" or "view only" access based on SCIMS Security Officer's certification. |
| | | SCOAP Mailings: |
| | | Users have access to all data relevant to this system. |
| | | |





| No. | Question | Response |
|------|--|---|
| | | County Office Newsletter (COF Newsletter): User access is limited to reading the database to extract the appropriate customer name and address information to support mailing the |
| 22.1 | Are procedures in place to detect or deter browsing or unauthorized user access? | newsletter. Yes No |
| 23 | Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)? | ✓ Yes ☐ No Customer Name / Address (MF): Firewalls in network and established security rules. |
| | | Customer Name / Address (S/36): Control of access to S/36 data is the responsibility of local County Office management, and is covered by whatever procedures are established and/or enforced there. |
| | to the state of the specific and the state of the state o | Service Center Information Management System (SCIMS): Firewalls in software and established security rules via eAuthenticiation, EAS, and Database Security. |
| | | SCOAP Mailings: Control of access to S/36 data is the responsibility of local County Office management, and is covered by whatever procedures are established and/or enforced there. |
| | | County Office Newsletter (COF Newsletter): No one has direct access to the data base. Information can only be accessed through the use of certified software to extract and build the mailing file. |





Customer Name and Address System (CN/AS)

3.6 Customer Protection

| No. | Question | Response |
|------|--|--|
| 24 | Who will be responsible for protecting the | Customer Name / Address (MF): |
| | privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)? | Consumer of the data (user/recipient). |
| | | Customer Name / Address (S/36): |
| | | Service Center employees |
| | | Service Center Information Management System (SCIMS): |
| | | Consumer of the data (user/recipient) |
| | | SCOAP Mailings: |
| | | Service Center employees |
| | | County Office Newsletter (COF Newsletter): |
| | | Consumer of the data/recipient |
| | | USDA Privacy Office |
| 25 | How can customers and employees contact the office or person responsible for protecting their | Contact FSA PII officer, John.Underwood@kcc.usda.gov |
| | privacy rights? | 816.926.6992 |
| 26 | A "breach" refers to a situation where data | Yes – If YES, go to question 27. |
| | and/or information assets are unduly exposed. Is a breach notification policy in place for this system? | Common FSA incident reporting process. No |
| 26.1 | If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date. | |





| No. | Question | Response |
|------|--|---|
| 27 | Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)? | ☐ Yes ☐ No – If NO, go to question 28. |
| 27.1 | Explain how this will be mitigated? | N/A |
| 28 | How will the system and its use ensure equitable treatment of customers? | Customer Name / Address (MF – S/35): All customers are processed through the same system; all employees use the same certified software. Service Center Information Management System (SCIMS): USDA Service Center agencies will share a common data base. SCOAP Mailings: Selection of mailing recipients is outside of the control of this system. Once a set of mailing recipients is presented to this system, the generation and processing of the mailing itself proceeds strictly in accordance with USPS postal regulations. There are no "fair and equal treatment" or nondiscrimination issues applicable to this system. |
| | | County Office Newsletter (COF Newsletter): FSA Service Center agencies will share a common data base. |
| 29 | Is there any possibility of treating customers or employees differently based upon their individual or group characteristics? | Yes No – If NO, go to question 30 |
| 29.1 | Explain | N/A |





Customer Name and Address System (CN/AS)

4 System of Record

| No. | Question | Response |
|---------------|---|--|
| 30 | Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual? | ✓ Yes No – If NO, go to question 31 Customer Name / Address (MF): Software systems can retrieve by Tax ID & Type and name. |
| | | Customer Name / Address (S/36): |
| | | Retrieved by Tax ID & Type and name. |
| - 100 000 mm. | | Service Center Information Management System (SCIMS): SCIMS Web Service retrieves by database row identifier ("core customer identifier") or by Tax ID & Type. SCIMS Application |
| | | retrieves by tax id & type and customer name. SCOAP Mailings: |
| | | No. Through the use of certified software accessible only by an authorized user. |
| | | County Office Newsletter (COF Newsletter): |
| | | No. Through the use of certified software accessible only by an authorized user. |





| No. | Question | Response |
|------|--|--|
| 30.1 | How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)? | Customer Name / Address (MF): |
| | | Retrieved by Tax ID & Type. |
| | | Customer Name / Address (S/36): |
| | | Retrieved by Tax ID & Type. |
| | | Service Center Information Management System (SCIMS): |
| | | SCIMS Web Service retrieves by database row identifier ("core customer identifier") or by Tax ID & Type. SCIMS Application retrieves by tax id & type and customer name. |
| | | SCOAP Mailings: |
| | | No. Through the use of certified software accessible only by an authorized user. |
| | | County Office Newsletter (COF Newsletter): |
| | | No. Through the use of certified software accessible only by an authorized user. |
| 30.2 | Under which Systems of Record (SOR) notice | Customer Name / Address (MF - S/36): |
| | does the system operate? Provide number, name and publication date. (SORs can be | Farm Records – USDA/FSA-2 |
| | | Service Center Information Management System (SCIMS): |
| | | Farm Records – USDA/FSA-2 |
| | | SCOAP Mailings: |
| | | Not a System of Record |
| | | County Office Newsletter (COF Newsletter): |
| | | Not a System of Record. |
| 30.3 | If the system is being modified, will the SOR require amendment or revision? | ☐ Yes ☑ No |





Customer Name and Address System (CN/AS)

5 Technology

| No. | Question | Response |
|------|---|---|
| 31 | Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)? | ✓ Yes ☐ No – If NO, the questionnaire is complete. Customer Name / Address (MF – S/36): No |
| | | Service Center Information Management System (SCIMS): Development language: ASP.Net |
| | | SCOAP Mailings: No. |
| | | County Office Newsletter (COF Newsletter): No. |
| 31.1 | How does the use of this technology affect customer privacy? | No affect. |





Customer Name and Address System (CN/AS)

6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.

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Date: August 7, 2009