



# **Privacy Impact Assessment (PIA) Farm Programs Management Systems (FPMS)**

Farm Record Files

Annual Rollover of Farm Records and Related Files

Web Farm Records Application (FRMS or WFRA)

Web Farm Records Listener (FRListener)

Web Farm Records Web Service (FRMS Web Service)

**Revision: Final**



**Farm Service Agency**

**Date: June 22, 2010**





Privacy Impact Assessment for  
Farm Programs Management Systems (FPMS)



## Document Information

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| Document Revision and History |               |                      |  |
|-------------------------------|---------------|----------------------|--|
| Revision                      | Date          | Author               | Comments   |
| 1.01                          | May 11, 2010  | Anita Trader, ISO DR | Initial version for 2010 copied from 2009 PIA              |
| 1.02                          | June 11, 2010 | Judy Sobbing, ECS    | Review and update, if warranted                            |
| 1.03                          | June 11, 2010 | Charles Schleper     | Reviewed, updated questions 14 and 18 et al, and approved. |
| Final                         | June 22, 2010 | R. Barbee, ECS       | Attached signature page to finalize document.              |

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# 1 Purpose of Document

USDA DM 35 15-002 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 **Farm Programs Management Systems** 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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## 2 System Information

**System Information**

| System Information   |  |
|--|--|
| Agency:  | Farm Service Agency  |
| System Name:   | Farm Programs Management Systems   |
| System Type:   | Major Application<br>General Support System<br>Non-major Application   |
| System Categorization (per FIPS 199):  | High<br>Moderate<br>Low  |
| Description of System:   | The Farm Program Management Systems (FPMS) supports the recording of farm, crop, owner, and tract data. Additionally, this group of systems includes a series of reference tables that capture detailed information about crops. This data is stored to support various FSA applications and congressional programs. |
| Who owns this system? (Name, agency, contact information)                        | Sharon Lovelace<br>6501 Beacon Drive<br>Kansas City MO 64133<br>(816)926-2115<br><a href="mailto:Sharon.Lovelace@kcc.usda.gov">Sharon.Lovelace@kcc.usda.gov</a>  |
| Who is the security contact for this system? (Name, agency, contact information) | Brian Davies<br>Information System Security Program Manager (IS SPM)<br>U.S. Department of Agriculture<br>Farm Service Agency<br>1400 Independence Avenue SW<br>Washington, D.C. 20250<br>(202) 720-2419<br><a href="mailto:brian_davies@wdc.usda.gov">brian_davies@wdc.usda.gov</a>                                 |



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|  |  |
|--|--|
| Who completed this document? (Name, agency, contact information) | Charles Schleper - FSA/ITSD/ADC/PARMO/FRG<br>6501 Beacon Drive<br>Kansas City MO 64133<br>816-926-1794<br><a href="mailto:charles.schleper@kcc.usda.gov">charles.schleper@kcc.usda.gov</a> |
|--|--|

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### 3 Data Information

#### 3.1 Data Collection

| No. | Question  | Response  |
|-----|---|---|
| 1   | Generally describe the data to be used in the system.   | Farm Programs Management Systems (S/36 Farm and Tract Files) use: <ol style="list-style-type: none"> <li>1) Producer information including land/tract relationships and other land information.</li> <li>2) Social Security or Tax ID Numbers to support owner/operator information.</li> </ol> The following Tables and File contain reference data that is not specific to any producer (customer) farming operations. <ul style="list-style-type: none"> <li>• Noninsured Crop Disaster Program Table</li> <li>• National Crop Table</li> <li>• Crop Disaster Table</li> <li>• Program Parameter File</li> </ul> |
| 2   | Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?   | Yes<br><br>No – If NO, go to question 3.  |
| 2.1 | State the law or regulation that requires the collection of this information.   | The Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397.  |
| 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<br><br>No   |
| 4   | Sources of the data in the system.  | FSA program information and customer/producer communiqués.  |
| 4.1 | What data is being collected from the customer?   | Producer information including land/tract relationships and other land information: Social Security or Tax ID Numbers to support owner/operator information.  |
| 4.2 | What USDA agencies are providing data for use in the system?  | Farm Service Agency (FSA).  |
| 4.3 | What state and local agencies are providing data for use in the system?   | None.   |

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| No. | Question   | Response   |
|-----|--|--|
| 4.4 | From what other third party sources is data being collected?   | None.  |
| 5   | Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources. | Yes<br>No – If NO, go to question 6.   |
| 5.1 | How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?                            | Data collected from customers is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness by State and County personnel upon initial entry into the system and then again when any required updates are made. |
| 5.2 | How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?                         | Data collected from USDA sources is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.                            |
| 5.3 | How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?                     | N/A.   |

**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?  | Data is provided as required for customers' voluntary participation in FSA farm-based crop production, support, and conservation programs as implemented by Congress. Data is used to determine the customers' eligibility to participate in the programs and to calculate program benefits if participation is |
| 7   | Will the data be used for any other purpose?   | Yes<br>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 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 | Ye<br>s<br>No   |

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| 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<br>No – If NO, go to question 10.  |
| 9.1  | Will the new data be placed in the individual's record (customer or employee)?  | Yes  |
| 9.2  | Can the system make determinations about customers or employees that would not be possible without the new data?  | Yes<br>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 is used to determine the customers' eligibility to participate in the programs and to calculate program benefits if participation is established. |
| 11   | Will the data be used for any other uses (routine or otherwise)?  | Yes<br>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<br>No – If NO, go to question 13.  |
| 12.1 | What controls are in place to protect the data and prevent unauthorized access?   | N/A.   |
| 13   | Are processes being consolidated?   | Yes<br>No – If NO, go to question 14.  |
| 13.1 | What controls are in place to protect the data and prevent unauthorized access?   | N/A.   |

### 3.3 Data Retention

| Question | Response |
|----------|----------|
|----------|----------|

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| No.  | Question  | Response  |
|------|---|---|
| 14   | Is the data periodically purged from the system?  | Yes<br>No – If NO, go to question 15.   |
| 14.1 | How long is the data retained whether it is on paper, electronic, in the system or in a backup?   | N/A.  |
| 14.2 | What are the procedures for purging the data at the end of the retention period?  | N/A.  |
| 14.3 | Where are these procedures documented?  | N/A.  |
| 15   | While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations? | Fairness in making determinations is assured when customer/producer information including election information is reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and when any required updates are made. |
| 16   | Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?  | Yes<br>s<br>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<br>No – If NO, go to question 18.  |
| 17.1 | How will the data be used by the other agency?   | Natural Resource Conservation Service employees have read-only access.   |
| 17.2 | Who is responsible for assuring the other agency properly uses the data?   | Natural Resource Conservation Service approved internal access/control procedures.   |
| 18   | Is the data transmitted to another agency or an independent site?  | Yes<br>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, there is a MOU in place for data transmitted to RMA, which includes provisions for ensuring PII and Privacy Act compliance. |
| 19   | Is the system operated in more than one site?  | Yes<br>No – If NO, go to question 20.  |
| 19.1 | How will consistent use of the system and data be maintained in all sites?   | Administrative controls and procedures are established to maintain consistent system use.  |

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**3.5 Data Access**

| No.  | Question  | Response  |
|------|---|---|
| 20   | Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?  | FSA Developers (Kansas City), FSA National employees (Washington), FSA State Office employees, FSA Service Center staff, and Natural Resource Conservation Service County Office employees . All access is for offices in the USA.  |
| 21   | How will user access to the data be determined?   | Access must be requested through FSA- 1 3A security forms with justification and approval.  |
| 21.1 | Are criteria, procedures, controls, and responsibilities regarding user access documented?  | Ye<br>s<br>No   |
| 22   | How will user access to the data be restricted?   | Identification and Authentication is performed by the OS/400 operating system and the S36 SSP operating system (userID and password required); Access is further restricted to S36 Partition (Service Center location) for S36 files. Identification and Authentication is performed by USDA eAuthentication (userID and password required) while additional authorization rights assigned by roles within FSA Extensible Authorization System for the web application. |
| 22.1 | Are procedures in place to detect or deter browsing or unauthorized user access?  | Ye<br>s   |
| 23   | Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)? | Ye<br>s<br>No   |

**3.6 Customer Protection**

| No. | Question  | Response                                 |
|-----|---|--|
| 24  | Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)? | FSA Privacy Act Officer/FSA PII Officer. |

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| No.  | Question  | Response  |
|------|---|---|
| 25   | How can customers and employees contact the office or person responsible for protecting their privacy rights?   | FSA National Help Desk at (800)-255-2434 or the Centralized Help Desk at 800-457-3642 or By contacting John W. Underwood, Privacy Officer, at<br>FSA Privacy Act Officer / FSA PII Officer<br>USDA - Farm Service Agency<br>Beacon Facility - Mail Stop 8388<br>9240 Troost Avenue<br>Kansas City, Missouri 64131-3055<br>Phone: 816-926-6992<br>Cell: 816-564-8950<br>Fax: 816-448-5833<br><a href="mailto:john.underwood@kcc.usda.gov">mailto:john.underwood@kcc.usda.gov</a> |
| 26   | A “breach” refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?   | Yes – If YES, go to question 27.<br>No  |
| 26.1 | If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.  | N/A.  |
| 27   | Consider the following:<br>Consolidation and linkage of files and systems<br>Derivation of data<br>Accelerated information processing and decision making<br>Use of new technologies<br>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)? | Yes<br>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?  | By providing a centralized and standardized method of developing program decisions.   |
| 29   | Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?   | Yes<br>No – If NO, go to question 30  |
| 29.1 | Explain   | N/A.  |

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## 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<br>No – If NO, go to question 31  |
| 30.1 | How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?  | The application supports the retrieval of system 36 files by file naming conventions and web data by selection of a customer through the SCIMS Customer Search page. Internally, then, the database (SQL or DB2) is queried using the SCIMS Core Customer Identifier. |
| 30.2 | Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)                         | USDA/FSA–2 - Farm Records File (Automated)  |
| 30.3 | If the system is being modified, will the SOR require amendment or revision?  | Yes   |



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## 5 Technology

| No.  | Question  | Response  |
|------|---|---|
| 31   | Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)? | Yes<br>No – If NO, the questionnaire is complete. |
| 31.1 | How does the use of this technology affect customer privacy?                                      | N/A.  |

## 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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# Privacy Impact Assessment Authorization Memorandum


I have carefully assessed the Privacy Impact Assessment for the  
Farm Programs Management Systems

This document has been completed in accordance with the requirements of the E-Government  
Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to  
proceed. Based on our authority and judgment, the continued operation of this system is  
authorized.

  
Sharon Lovelace, Information System Owner

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John Underwood, Chief Privacy Officer

\_\_\_\_\_ 6/17/10  
Date

  
James Gwinn, FSA CIO

\_\_\_\_\_ 6/22/2010  
Date