



# **Privacy Impact Assessment (PIA)**

**Milk Income Loss Contract  
(MILC)**

**Revision: 1.2**



**Farm Service Agency**

**Date: February 17, 2010**





## Document Information

Owner Details	
Name	C. Michael Boyles
Contact Number	(816) 926-1905
E-mail Address	<a href="mailto:mike.boyles@kcc.usda.gov">mike.boyles@kcc.usda.gov</a>

Document Revision and History			
Revision	Date	Author	Comments
1.0	February 17, 2010	Judy Sobbing, ECS	Initial Version
1.1	February 17, 2010	Jack W. Meis, PSCAO/SFG	Initial review
1.2	February 23, 2010	Judy Sobbing, ECS	Changes recommended by John Underwood to question 2.1, 4.2, 7, 11, 15, 17, 17.1, 17.2, 22.1, 23, and 30.3



## Table of Contents

<b>1 PURPOSE OF DOCUMENT .....</b>	<b>1</b>
<b>2 SYSTEM INFORMATION .....</b>	<b>2</b>
<b>3 DATA INFORMATION .....</b>	<b>3</b>
<b>3.1 Data Collection .....</b>	<b>3</b>
<b>3.2 Data Use .....</b>	<b>4</b>
<b>3.3 Data Retention.....</b>	<b>6</b>
<b>3.4 Data Sharing .....</b>	<b>6</b>
<b>3.5 Data Access .....</b>	<b>7</b>
<b>3.6 Customer Protection.....</b>	<b>7</b>
<b>4 SYSTEM OF RECORD .....</b>	<b>9</b>
<b>5 TECHNOLOGY .....</b>	<b>10</b>
<b>6 COMPLETION INSTRUCTIONS .....</b>	<b>11</b>







# 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 the **Milk Income Loss Contract (MILC)** 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*.



## 2 System Information

### System Information

System Information	
Agency:	Farm Service Agency
System Name:	Milk Income Loss Contract (MILC)
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	The Milk Income Loss Contract (MILC) Program is a monthly payment system based on milk production provided by producers. MILC financially compensates dairy producers when domestic milk prices fall below set prices. The Food, Conservation, and Energy Act of 2008 (2008 Farm Bill) continues sign up to FSA's Milk Income Loss Contract (MILC) Program beginning 90 days after its enactment and ending on September 30, 2012.
Who owns this system? (Name, agency, contact information)	C. Michael Boyles FSA/ITSD/ADC/PSCAO (816) 926-1905 <a href="mailto:mike.boyles@kcc.usda.gov">mike.boyles@kcc.usda.gov</a>
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 <a href="mailto:brian.davies@wdc.usda.gov">brian.davies@wdc.usda.gov</a>
Who completed this document? (Name, agency, contact information)	Jack W. Meis FSA/ITSD/ADC/PSCAO/SFG (816) 823-1809 <a href="mailto:jack.meis@kcc.usda.gov">jack.meis@kcc.usda.gov</a>





### 3 Data Information

#### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer – SS#/Tax ID, name, entity type, payment, production eligibility, producer, production and payment information Employee – user eAuth code, approval and compliance information Other – none.
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.	Executive Order 9397, the Commodity Credit Corporation Charter Act (15 U.S .C. 714 et seq.), and the Food, Conservation, and Energy Act of 2008 (Pub. L. 110-246)
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.	Producer, actual production evidence, manual data input by COF employees. SCIMS, MILC database, Subsidiary, MRT, NPS, eAuth and CBS. AMS provides the Boston Class I Milk Price in the Northeast under their Federal Milk Marketing Order and NASS provides the Feed Prices used to determine an Adjusted MILC Monthly Payment Rate.
4.1	What data is being collected from the customer?	Dairy information, producer information, production data.
4.2	What USDA agencies are providing data for use in the system?	Farm Service 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?	Production evidence received from the producers who have received it from milk handlers that contain a dairy operations actual production.
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 No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Production evidence must come from a third party verifiable source, System validations, compliance checks, manual spot checks, COR Reviews
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Production evidence must come from a third party verifiable source, System validations, Compliance checks, manual spot checks, COR Reviews
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Production evidence must come from a third party verifiable source, System validations, Compliance checks, manual spot checks, COR Reviews

### 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?	To determine the amount of payment the producer may be eligible to receive.
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?	
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 s No



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
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?	System and manual validations.
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?	To determine the amount of payment the producer may be eligible to receive.
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?	
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 No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	eAuthentication provides discretionary access controls.
13	Are processes being consolidated?	Yes No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	eAuthentication and role-based authorization through the use of the EAS service.



### 3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	Yes No – If NO, go to question 15. Data is retained indefinitely; however data can be archived on removable media. Any data archived and removed is done so without the knowledge of or approval from the System Owner.
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?	
14.3	Where are these procedures documented?	
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 the Milk Income Loss Contract information is reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again 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 s 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.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
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?	



No.	Question	Response
19	Is the system operated in more than one site?	Yes No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	All system software is the same at all sites. Centralized system at Beacon location. Access is through the intranet.

### 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.)?	COF personnel/users System Administrators Developers/Testers
21	How will user access to the data be determined?	Currently only FSA personnel are users of the system which is accessed by eAuthentication and EAS Roles.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes s No
22	How will user access to the data be restricted?	COF use is specified in an EAS role. KCMO can see all information.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	Ye s 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.)?	Production Adjustment and Risk Management Office and USDA Privacy Office.



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 FSA Privacy Act Officer / FSA PII Officer USDA - Farm Service Agency Beacon Facility - Mail Stop 8388 6501 Beacon Drive Kansas City, Missouri 64133 Phone: 816-926-6992 Cell: 816-564-8938 Fax: 816-448-5833 <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. 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.	
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. Appeal process (manual not system driven) Eligibility
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	All users use the same system. COR reviews and spot checks are used to verify manual entry information is accurate.
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	



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
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Name of dairy operation, producer tax ID # and producer name.
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) USDA/FSA-14 – Applicant/Borrower.
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes



## 4 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.
31.1	How does the use of this technology affect customer privacy?	





## 5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-1 1, 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.



## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Milk Income Loss Contract (MILC)  
(System Name)

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.

\_\_\_\_\_  
C. Michael Boyles, System Owner

\_\_\_\_\_  
Date

\_\_\_\_\_  
John Underwood, Chief Privacy Officer

\_\_\_\_\_  
Date

\_\_\_\_\_  
James Gwinn, FSA CIO

\_\_\_\_\_  
Date



# Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Milk Income Loss Contract (MILC) \_\_\_\_\_  
(System Name)

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.

February 18, 2010

\_\_\_\_\_  
C. Michael Boyles, System Owner

\_\_\_\_\_  
Date

February 19, 2010

\_\_\_\_\_  
Privacy Officer

\_\_\_\_\_  
John Underwood, Chief  
Date

\_\_\_\_\_  
James 71YF SA CIO

\_\_\_\_\_  
3, 7/c>  
Date