



Privacy Impact Assessment (PIA)

**Direct Counter-Cyclical Enrollment &
Payment System (DCP)**

Payments/Overpayments (DCP-PO)

Revision: *Final*



Farm Service Agency

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Document Information

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Document Revision and History			
Revision	Date	Author	Comments
	11/13/2009	S. Timbrook, ECS	<i>Original Document</i>
	11/17/2009	D. Murphy	Updates
	12/07/2009	S. Timbrook, ECS	Reviewed updates and released for final review by system owner and signatures.
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	1/26/2010	S. Timbrook, ECS	Revised comments from J.Underwood



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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 the for **Direct Counter-Cyclical Enrollment & Payment System (DCP)-Payments /Overpayments (DCP-PO)** 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

Agency:	Farm Service Agency
System Name:	Direct Counter-Cyclical Enrollment & Payment System - Payments/Overpayments (DCP-PO)
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	The DCP Payments/Overpayments is the intergraded process that receives the approved contracts from the DCP/ACRE Signup application/system and then computes payments using the base acres and payment yields established for each farm. There are two types of DCP payments - direct payments and counter-cyclical payments. Both are computed using the base acres and payment yields established for the farm. Farmers receive direct payments at rates established by statute regardless of market prices. On the other hand, counter-cyclical payments rates vary depending on market prices. Counter-cyclical payments are issued only when the effective price (which takes into account the direct payment rate, market price and loan rate) for the crop is below the target price for the commodity. The FISMA Child Payments / Overpayments application/system includes a sub-process which records the actual amounts of payments and along with any overpayments made.
Who owns this system? (Name, agency, contact information)	Sandy Bryant, Branch Chief, CBP, WDC ITSD/ADC/PARMO U.S. Department of Agriculture Farm Service Agency 1400 Independence AVE. SW 4754-S Washington DC, 20250 (202) 720-4380 Sandy.Bryant@wdc.usda.gov



Who is the security contact for this system? (Name, agency, contact information)	<p>Brian Davies Information System Security Program Manager (IS SPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov</p>
Who completed this document? (Name, agency, contact information)	<p>David Murphy PARMO 816-926-2168 David.murphy@kcc.usda.gov</p>

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Name, address, ID number, farm number, crop, base acres, direct yield, counter cyclical yield, producer share data, direct advance date (month and year), counter cyclical advances, refuse payment flag.
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.	N/A

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
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No.	Question	Response
4	Sources of the data in the system.	Customer Farm records and Farm Service Agency compliance and payment program guidance.
4.1	What data is being collected from the customer?	Customer Farm records and Farm Service Agency compliance and payment program guidance.
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?	N/A
4.4	From what other third party sources is data being collected?	N/A
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?	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 updatesw are made.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A
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 will be used to determine payments to producers using the base acres and payment yields established for each farm.
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



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No.	Question	Response
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	Yes s No
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 s
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	Yes s No
9.3	How will the new data be verified for relevance and accuracy?	Data is kept synchronized by the DCP Sign up application. All data is entered via the agency's users. Users have manual processes in place to ensure the accuracy of the data being entered into the system. Spot check, audits, manual verification, system tested calculations, system edits.
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 determine payments to producers using the base acres and payment yields established for each farm.
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 No – If NO, go to question 13.



No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	Employee id/password on System 36, Role-based security within the application.
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?	N/A

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	Yes 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?	Payment information is reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and when any required updates are made. Data is kept synchronized by the DCP Sign up application.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Ye 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?	N/A
17.2	Who is responsible for assuring the other agency properly uses the data?	N/A
18	Is the data transmitted to another agency or an independent site?	Yes No – If NO, go to question 19.



No.	Question	Response
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
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?	Administrative controls and procedures are established to maintain consistent system use.

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.)?	County office employees, system developers, system testers, System administrators.
21	How will user access to the data be determined?	Access must be requested through FSA1 3A security forms with justification. Following standard agency procedures, job function and role are key factors in the granting access. Once approved, access is restricted by user ID and password.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes No
22	How will user access to the data be restricted?	Users are restricted through role-based security within the application. Other users are restricted by based on ID level security granted through eAuth/EAS and database administrators.
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.)?	Yes 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.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	<p>FSA National Help Desk at (800)-255-2434 or the Centralized Help Desk at 800-457-3642 or</p> <p>By contacting John W. Underwood, Privacy Officer, at FSA Privacy Act Officer / FSA PII Officer USDA - Farm Service Agency Beacon Facility - Mail Stop 8388 9240 Troost Avenue Kansas City, Missouri 64131-3055 Phone: 816-926-6992 Cell: 816-564-8938 Fax: 816-448-5833 mailto:john.underwood@kcc.usda.gov</p>
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?	<p>Yes – If YES, go to question 27. No</p>
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	N/A
27	<p>Consider the following:</p> <ul style="list-style-type: none"> Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies <p>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?</p>	<p>Yes No – If NO, go to question 28.</p>
27.1	Explain how this will be mitigated?	N/A



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No.	Question	Response
28	How will the system and its use ensure equitable treatment of customers?	The Financial Management Systems are implemented using a methodology that ensures data processing will be accomplished in the same manner for all customers.
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	

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 3 1
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data can be retrieved by farm number in a particular state and county for a program year.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	USDA/FSA-2, Farm Records File (Automated) USDA/FSA- 1 4, Applicant/Borrower
30.3	If the system is being modified, will the SOR require amendment or revision?	Ye s

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.
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-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.



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**Privacy Impact Assessment Authorization
Memorandum**

I have carefully assessed the Privacy Impact Assessment for the

**Direct Counter-Cyclical Enrollment & Payment System (DCP)-
Payments/Overpayment (DCP-PO).**

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.

Sandy Bryant
Sandy Bryant
System Manager/Owner

1-14-10
Date

John W. Underwood
John W. Underwood
Agency's Chief FOIA officer

1/22/10
Date

Jim Gwinn
Jim Gwinn
Agency CIO

1/27/2010
Date



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Agency's Chief FOIA officer

Date

Jim Gwinn
Agency CIO

Date