



**Privacy Impact Assessment
(PIA)
GSM Export Credit Guarantee Systems
(GSM/Web/PC)**

Revision: Final

Farm Service Agency





Document Information

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Document Revision and History			
Revision	Date	Author	Comments
Draft v.01	11/10/2009	T. Ostrander	<i>Initial</i>
Final	11/12/2009	S. Timbrook, ECS	Reviewed and released for signatures
	11/24/2009	S. Timbrook, ECS	Revised and added comments J. Underwood sections 4,5.2,5.3,6,20 released for final signature.



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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 **GSM Export Credit Guarantee Systems (GSM/Web/PC)** 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:	GSM Export Credit Guarantee Systems (GSM/Web/PC)
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	The General Sales Manager Export Credit Guarantee System is an application-based system that supports both the USDA Farm Service Agency (FSA) and the Foreign Agricultural Service (FAS). The application's mission is to provide reporting of financial and GSM-102 program data to the FSA Financial Management Division (FMD) via the General Sales Manager Data Mart (GSMDM) and to provide application operational support for FSA.
Who owns this system? (Name, agency, contact information)	Angela Sieg United States Department of Agriculture (USDA) Farm Service Agency (FSA) 6501 Beacon Drive Kansas City MO 64133 (816) 926-1568 Angela.Sieg@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)	Chris Caruthers U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133 (816) 926-6848 Christophor.caruthers@kcc.usda.gov
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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.	Customer data: evidence of export, notice of default, notice of assignment, claims, recoveries, fees, guarantee bank name, payment bank name and payment bank account number.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	Customer, banks, Treasury Department, Foreign Agricultural Service (FAS), Farm Service Agency (FSA), Financial Management Division.
4.1	What data is being collected from the customer?	Customer data: evidence of export, notice of default, notice of assignment, claims, recoveries, fees, guarantee bank name, payment bank name and payment bank account number.



No.	Question	Response
4.2	What USDA agencies are providing data for use in the system?	Foreign Agricultural Service (FAS), Farm Service Agency (FSA) Financial Management Division
4.3	What state and local agencies are providing data for use in the system?	NONE
4.4	From what other third party sources is data being collected?	U.S. Treasury Department
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Reconciliation and Review by Farm Service Agency (FSA) – Financial Management Division (FMD) The validations are accomplished by implementing field, module and system level validation against user data inputs
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Reconciliation and Review by Farm Service Agency (FSA) – Financial Management Division (FMD)
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Reconciliation and Review by Farm Service Agency (FSA) – Financial Management Division (FMD)

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 streamline the reporting process by implementing a common computing procedure that accommodates the programming team in performing maintenance of the financial data collected by the GSM Web PC application"
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	



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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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	
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 streamline the reporting process by implementing a common computing procedure that accommodates the programming team in performing maintenance of the financial data collected by the GSM Web PC application
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	



No.	Question	Response
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	
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?	Agreements, payment schedules, exports, shipments, disbursements, and cash receipts are 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	The data will be used by the Office of Foreign Assets Control (“OFAC”) of the U.S. Treasury Department. The OFAC office ensures that terrorist, international narcotics traffickers and other restricted persons are not allowed to participate in U.S. Government programs such as GSM.



No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	The data recipient is responsible for the proper use of the data. All data that is forwarded contains the following statement. This e-mail and any attachments may contain sensitive data. It is your responsibility to adhere to USDA policies and notices in the internal and external use and protection of sensitive data. If you authorize the release of this information you must ensure the recipient is notified that the data is sensitive and that the recipient is responsible for securing and protecting the data.
18	Is the data transmitted to another agency or an independent site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	MOU between NITC and Treasury 11/2009
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.)?	Customers, USDA employees have Update Access, Exporters may submit data online and by request through FAS or FSA, OIG and Congress may receive reports. WDC Users.
21	How will user access to the data be determined?	Access must be requested through FSA-13A security forms with justification
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



No.	Question	Response
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. Once access has been properly granted, there are no restrictions to viewing the data. Update capabilities are restricted by User ID.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	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 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
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?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	



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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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	Implementing a common computing procedure 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (e.g., employee number, social security number, etc.)?	
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 .)	
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input type="checkbox"/> No

5 Technology

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



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Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

GSM Export Credit Guarantee Systems (GSM/Web/PC)

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

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

Angela Segal
System Manager/Owner

11/12/09
Date

John W. Underwood
John Underwood, Chief Privacy Officer
Agency's Chief FOIA officer

11/20/09
Date

Michael Spence
Chief Information Security Officer

12/14/2009
Date