



# **Privacy Impact Assessment**

## **Multi-Family Management (MFM)**

*Revision: 1.3*

*Rural Development*

*Date: May 20, 2009*



## Document Information

Owner Details	
Name	Glen Boeckmann Chief, Management Services Technologies Branch
Contact Number	314-457-4945
E-mail Address	<a href="mailto:glennon.boeckmann@stl.usda.gov">glennon.boeckmann@stl.usda.gov</a>

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Revision	Date	Author	Comments
1.0	30 Aug 08	Tom Case	New document
1.1	7 Feb 09	Tom Case	Update #25 FOI POC
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Distribution List			
Name	Title	Agency/Office	Contact Information
Glennon Boeckmann	System Owner	USDA/RD/ O&M/DCIO/ESDDD	<a href="mailto:glennon.boeckmann@stl.usda.gov">glennon.boeckmann@stl.usda.gov</a> 314-457-4945
Thomas Hertel	System POC	USDA/RD/ O&M/DCIO/ESDDD	<a href="mailto:thomas.hertel@stl.usda.gov">thomas.hertel@stl.usda.gov</a> 314-457-4951
Jeffery Carpenter	System POC	USDA/RD/ O&M/DCIO/ESDDD	<a href="mailto:jeffery.carpenter@stl.usda.gov">jeffery.carpenter@stl.usda.gov</a> 314-457-4946
Cynthia Richey	System POC	USDA/RD/ O&M/DCIO/ESDDD	<a href="mailto:cynthia.richey@stl.usda.gov">cynthia.richey@stl.usda.gov</a> 314-457-4850
Eugene Texter	Information System Security	USDA/RD/ O&M/DCIO/ISSS	<a href="mailto:eugene.texter@stl.usda.gov">eugene.texter@stl.usda.gov</a> 314-457-4778
Bill Dallas	Information System Security	USDA/RD/ O&M/DCIO/ISSS	<a href="mailto:bill.dallas@stl.usda.gov">bill.dallas@stl.usda.gov</a> 314-457-4771
Tom Case	Information System Security	USDA/RD/ O&M/DCIO/ISSS	<a href="mailto:tom.case@stl.usda.gov">tom.case@stl.usda.gov</a> 314-457-4799
Matt Rieger	Information System Security	USDA/RD/ O&M/DCIO/ISSS	<a href="mailto:matt.rieger@stl.usda.gov">matt.rieger@stl.usda.gov</a> 314-457-4788



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# 1 System Information

System Information	
Agency:	USDA Rural Development (USDA RD)
System Name:	Multi-Family Management (MFM)
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:	<p>Multi Family Management (MFM) is a Multi-Family Housing (MFH) line of business that includes all of the information systems for making and servicing MFH loans and grants. It is a mission-critical CPIC system with a FIPS 199 security rating of "moderate." The four sub-systems of MFM are: Automated Multi-Family Account System (AMAS), Multi-Family Integrated System (MFIS) that contains the module Prepayment Tracking (Pre-Trac), Management Agent Interactive Network Connection System (MINC), and Multi-Family Support. Multi-Family Support contains the two modules of Multi-Family Housing Rentals (MFH Rentals) and Preservation Information Exchange (PIX). AMAS is hosted on the NITC mainframe while the other applications are hosted on the Kansas City Web Farm. Multi-Family Support modules have a Confidentiality, Integrity, and Availability rating of Low, Low, and Low, therefore, are not included in this PIA.</p>
Who owns this system? (Name, agency, contact information)	<p>Glen Boeckmann            Chief, Management Services Technologies Branch            USDA Rural Development            4300 Goodfellow Blvd.            St. Louis, MO 63120-1703  <a href="mailto:glennon.boeckmann@stl.usda.gov">glennon.boeckmann@stl.usda.gov</a>            314-457-4945</p>
Who is the security contact for this system? (Name, agency, contact information)	<p>Eugene Texter            USDA Rural Development            Building 105, FC-44            4300 Goodfellow Boulevard            St. Louis, MO 63120  <a href="mailto:eugene.texter@stl.usda.gov">eugene.texter@stl.usda.gov</a>            314-457-4778</p> <p>Brenda Dinges            USDA Rural Development            Building 105, FC-44            4300 Goodfellow Boulevard            St. Louis, MO 63120  <a href="mailto:brenda.dinges@stl.usda.gov">brenda.dinges@stl.usda.gov</a>            314-457-4772</p>
Who completed this document? (Name, agency, contact information)	<p>Glen Boeckmann            Chief, Management Services Technologies Branch            USDA Rural Development            4300 Goodfellow Blvd.            St. Louis, MO 63120-1703  <a href="mailto:glennon.boeckmann@stl.usda.gov">glennon.boeckmann@stl.usda.gov</a></p>



	314-457-4945
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## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p><b>AMAS Customer Information:</b> Client names, Social Security Numbers of Borrowers, Co-Borrowers, Key Members addresses, and business financial data, debt payment information. Voucher recipient name, Voucher payment borrower name, Monthly voucher amount.</p> <p><b>MFIS Customer Information:</b> Management agent, borrower and key member names and social security numbers. Borrower debt payment information. Project housing unit and rent information.</p> <p><b>MFIS Tenant Information:</b> Tenant household information including name, social security numbers and financial information.</p> <p><b>MINC Customer Information:</b> Management agent, borrower and key member names and social security numbers. Borrower debt payment information. Project housing unit and rent information.</p> <p><b>MINC Tenant Information:</b> Tenant household information including name, social security numbers and financial information.</p>
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	7 U.S.C. 1921 et seq., 42 U.S.C. 1471 et seq., and 42 U.S.C. 2706.
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.	
4.1	What data is being collected from the customer?	<p><b>AMAS:</b> Information included contains Social Security Numbers of Borrowers, Co-Borrowers, Key Members, and Lender Identification Numbers, debt payment information, client names, lender names, addresses, and business financial data. Voucher recipient name, Voucher payment borrower name,</p>



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No.	Question	Response
		<p>Monthly voucher amount.</p> <p><b>MFIS, MINC:</b> Information included contains social security numbers of borrowers, management agents, key members, and tenant social security numbers, debt payment information, customer names, tenant names, addresses, and business financial data.</p>
4.2	<p>What USDA agencies are providing data for use in the system?</p>	<p><b>AMAS:</b> Rural Development field office personnel collect the Loan Obligation information from prospective Borrowers/Applicants.</p> <p><b>MFIS:</b> Data entry screens are completed via the web by RD Area Specialists for borrowers who do not participate through MINC. Batch feeds are obtained nightly from the AMAS mainframe system for borrower and project detail information.</p> <p><b>MINC:</b> None</p>
4.3	<p>What state and local agencies are providing data for use in the system?</p>	<p><b>AMAS/MFIS/MINC:</b> None</p>
4.4	<p>From what other third party sources is data being collected?</p>	<p><b>AMAS:</b> None</p> <p><b>MFIS, MINC:</b> Data transmitted in ASCII File format through Gentran product from Management Agents/Service Bureaus Vendor Software.</p>
5	<p>Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No – If NO, go to question 6.</p>
5.1	<p>How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?</p>	<p>a. The applications capability to establish access control lists (ACL) or registers is based upon the basic security setup of the operating system.</p> <p>b. Application users are restricted from accessing the operating system, other applications, or other system resources not needed in the performance of their duties via access given to user Ids is limited to what is needed to perform their job.</p> <p>c. The controls used to detect unauthorized transaction attempts are security logs/audit trails.</p> <p>d. Users are required to have password-protected screensavers on their PC's to prevent unauthorized access.</p> <p>e. Warning banners are used to warn and inform users who sign on to the system that this is a secure and private network. Warning banners are in compliance with USDA guidelines.</p>
5.2	<p>How will the data collected from USDA sources be verified for accuracy, relevance, timeliness,</p>	<p>Same as 5.1</p>



No.	Question	Response
	and completeness?	
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	<p>a. Data transmitted in ASCII File format through Gentran product must meet file format specifications and then each transaction is evaluated to meet business rules and USDA Regulations. Any transactions outside the expected values must be accepted by servicing personnel.</p> <p>b. Management Agents validate tenant data prior to approval of project worksheets.</p>

## 2.2 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?	<p><b>AMAS:</b> AMAS provides online transaction entry, batch processing and inquiry support for accounting, financial management and management information purposes for Rural Development servicing offices, State Offices, National Office and the Finance Office.</p> <p><b>MFIS:</b> MFIS is one of USDA's official accounting support systems for the Multi-Family Housing program in Rural Development. MFIS is an online transaction entry and inquiry support system accessed by over 200 field offices, the National Office, and Finance Office.</p> <p><b>MINC:</b> MINC is one of USDA's official accounting support systems for the Multi-Family Housing (MFH) program in Rural Development. MINC is an online transaction entry, transmission and inquiry support system accessed by over 7,000 external trusted partners (MFH Management Agents).</p>
7	Will the data be used for any other purpose?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No – If NO, go to question 8.</p>
7.1	What are the other purposes?	<p><b>AMAS:</b> The system generates a variety of daily, weekly, monthly, quarterly and yearly reports. This is instrumental in the systems ability to provide up to date information on the loans portfolio.</p> <p><b>MFIS:</b> The system generates a project worksheet. This instrument calculates the overage, RA and final payment for all projects on a monthly basis.</p> <p><b>MINC:</b> This system is a display and collection system for the data held in MFIS. It does not store or maintain any data unique to the application. See the MFIS response for a description of the data displayed and or collected.</p>
8	Is the use of the data both relevant and necessary to the purpose for which the system is	<p><input checked="" type="checkbox"/> Yes</p>



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No.	Question	Response
	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 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 checked="" type="checkbox"/> Yes <input 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)?	<b>AMAS:</b> No. The system is hierarchal by design and any individuals information is within this design and must be obtained by 'walking the data base' to gather information. <b>MFIS:</b> Yes. The systems stores a monthly record of the payment attributes. <b>MINC:</b> No. This system is a display and collection system for the data held in MFIS. It does not store or maintain any data unique to the application. See the MFIS response for a description of the data displayed and or collected.
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 checked="" type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	<b>AMAS:</b> The data is reviewed by area specialists. <b>MFIS:</b> The data is reviewed by area specialists and transferred to the project management agents. These management agents verify the data against their own records and approve the final payment details. <b>MINC:</b> The MFIS payment data is transferred to the project management agents via MINC. These management agents verify the data against their own records and approve the final payment details.
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?	Same as 6.
11	Will the data be used for any other uses (routine or otherwise)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	<b>AMAS:</b> The system generates a variety of daily, weekly, monthly, quarterly and yearly reports. This is instrumental in the systems ability to provide up to date information on the loans portfolio. <b>MFIS:</b> The system generates a project worksheet. This instrument calculates the overage, RA and final payment for all projects on a monthly basis. <b>MINC:</b> This system is a display and collection system for the data held in MFIS. It does not



No.	Question	Response
		store or maintain any data unique to the application. See the MFIS response for a description of the data displayed and or collected.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	NIST 800-53A controls for the MFM system are discussed in detail in the MFM System Security Plan.
13	Are processes being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	NIST 800-53A controls for the MFM system are discussed in detail in the MFM System Security Plan.

## 2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input 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?	<b>AMAS:</b> The system stores 3 years of history data online. Remaining history is kept on archived tapes and has infinite retention. <b>MFIS:</b> The system stores 3 years (or last 3 items) for annual data. Non-annual data has infinite retention. <b>MINC:</b> N/A. This system is a display and collection system for the data held in MFIS. It does not store or maintain any data unique to the application.
14.2	What are the procedures for purging the data at the end of the retention period?	<b>AMAS:</b> Once data is no longer needed, it is properly destroyed. Methods such as overwriting the entire media, degausses, and disk formatting are used, but strict attention is paid to whatever process is selected to ensure that all unneeded data is completely destroyed. Papers and other soft materials, such as microfiche and floppy disks, are shredded. <b>MFIS:</b> Annual data is shipped to the data warehouse via files produced on a monthly basis. Procedures are in place to assure that once data is no longer needed, it is properly destroyed. Methods such as overwriting the

No.	Question	Response
		<p>entire media, de-gaussers, and disk formatting are used, but strict attention is paid to whatever process is selected to ensure that all unneeded data is completely destroyed. Papers and other soft materials, such as microfiche and floppy disks, are shredded.</p> <p><b>MINC:</b> N/A. This system is a display and collection system for the data held in MFIS. It does not store or maintain any data unique to the application.</p>
14.3	Where are these procedures documented?	<p><b>AMAS:</b> NITC controls cleaning of archival tapes and materials</p> <p><b>MFIS:</b> The Data Warehouse organization controls the cleaning and disposal of all data warehouse material no longer needed. Procedures for purging of data in MFIS is documented in the online help document MFIS Batch Processes.</p> <p><b>MINC:</b> N/A. This system is a display and collection system for the data held in MFIS. It does not store or maintain any data unique to the application. See the MFIS response for a description of the purging of data.</p>
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?	<p><b>AMAS:</b> The IDMS DBMS backup procedures on the AMAS database are established by the National Information Technology Center (NITC) for data restoration events. The data is backed-up nightly. Servicing Office personnel and the Deputy Chief Financial Officer (DCFO) staff verify data correctness via reports available within the AMAS application.</p> <p><b>MFIS:</b> Oracle DBMS and Archive Procedures on the database are established by the St. Louis Web Farm for data restoration events. Servicing Office personnel and Management agents via reports available within the MFIS application verify data correctness.</p> <p><b>MINC:</b> This system is a display and collection system for the data held in MFIS. It does not store or maintain any data unique to the application. MINC users validate MFIS data and notify MFIS if any discrepancies are found. See the MFIS response for a description of the data displayed and or collected.</p>
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

## 2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal,	<p><b>AMAS:</b> Farm Service Agency (PLAS)</p> <p><b>MFIS:</b> US Bank and FEMA</p> <p><b>MINC:</b> No.</p>



No.	Question	Response
	state, local, other, etc.)?	
17.1	How will the data be used by the other agency?	<p><b>AMAS:</b> The system utilizes input from PLAS and supplies input to PLAS through files during certain update cycles of the respective databases. The push to PLAS includes a FAADS data file which is merged with PLAS data and forwarded to the National Finance Center (NFC). The push to PLAS also includes General Ledger data that is merged with other data at PLAS. The system also supplies a file to the RD data warehouse.</p> <p><b>MFIS:</b> The system utilizes input from the AMAS system and supplies input to the AMAS system through files during certain update cycles of the respective databases. The system supplies a file to the RD data warehouse. FEMA data contains no PII information and is used for determining vacancy information. US Bank data indicate the projects that need additional attention before processing monthly payments</p> <p><b>MINC:</b> Data may be sent through MINC to the MFIS system but Data is not shared from MINC to vendor software.</p>
17.2	Who is responsible for assuring the other agency properly uses the data?	The system owner.
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?	Yes. All external connections require an Interconnection Service Agreement or Memorandum of Understanding.
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" 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?	N/A

## 2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	<p><b>AMAS:</b> USDA RD AMAS system users and managers.</p> <p><b>MFIS:</b> USDA RD MFIS system users and managers, MFIS Systems Administrators, MFIS Trusted Management Agents.</p> <p><b>MINC:</b> MFH External Trusted Partners or Management Agents.</p>
21	How will user access to the data be determined?	<b>AMAS, MFIS, MINC:</b> Desk Procedures document the process for establishing, activating, and modifying IDs. This process is defined by System Owners. System Owners define Groups and account types. System Point of Contact assigns group membership and



No.	Question	Response
		<p>determines Need-to-know validation. The POC is responsible for verifying user identification; the User Access Management Team (UAMT) relies on a POC supplying the correct userid and password to Logbook to identify themselves. Log Book tickets are the tool used to track authorized requests by approving Point of Contact (POC)</p> <p>Currently RD reviews reports from HR on a Bi-weekly basis. The organization employs automated mechanisms to support the management of information system accounts. Temporary and emergency accounts are not used or authorized. Guest and Anonymous accounts are not managed by ISS UAM Team. POCs (empowered by RD IT managers) are responsible for notifying UAMT if access or roles need to be modified and periodically reviewing and certifying established access.</p>
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	Privileges granted are based on job functions and area of authority (e.g. State office user with authority for their state only, Management Agent versus a Management Agent User).
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

## 2.6 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.)?	The system owner.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	<p>Customers and employees may contact the Freedom of Information Officer:</p> <p style="text-align: center;">           Andrea Jenkins            Freedom of Information Officer            Rural Development, USDA            7th Floor, Reporter's Bldg.            Washington, DC 20250  <a href="mailto:Andrea.Jenkins@wdc.usda.gov">Andrea.Jenkins@wdc.usda.gov</a>            (202) 692-0029         </p>



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No.	Question	Response
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.	N/A
27	Consider the following: <ul style="list-style-type: none"> <li>▪ Consolidation and linkage of files and systems</li> <li>▪ Derivation of data</li> <li>▪ Accelerated information processing and decision making</li> <li>▪ Use of new technologies</li> </ul> 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?	N/A
28	How will the system and its use ensure equitable treatment of customers?	<p><u>DM 3515-002, section e states:</u> To fulfill the commitment of the USDA to protect customer and employee data, several issues must be addressed with respect to privacy:</p> <ul style="list-style-type: none"> <li>a. The use of information must be controlled; and</li> <li>b. Information may be used only for a necessary and lawful purpose.</li> </ul> <p>Where Public Affairs systems of records are involved:</p> <ul style="list-style-type: none"> <li>a. Individuals must be informed in writing of the principal purpose and routine uses of the information being collected from them;</li> <li>b. Information collected for a particular purpose should not be used for another purpose without the subject's consent unless such other uses are specifically authorized or mandated by law; and</li> <li>c. Any information used must be sufficiently accurate, relevant, timely, and complete to assure fair treatment of the individual.</li> </ul> <p>Also, <u>P.L. 95-454, the Civil Service Reform Act of 1978</u> which is enforced by The U.S. Equal Employment Opportunity Commission (EEOC) ensures the equitable treatment of the employees.</p>
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	N/A

### 3 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 checked="" type="checkbox"/> Yes <input 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 (i.e., employee number, social security number, etc.)?	<p><b>AMAS:</b> Data is retrieved by AMAS authorized users through login ID's using ACF2 IDs that are Management Agents/Service Bureaus Vendor Software on the NITC mainframe. It can be retrieved using an individual's Social Security Number.</p> <p><b>MFIS:</b> Data is retrieved by MFIS authorized users using Level 2 eAuthentication user ID's that are cross-referenced with ACF2 login IDs that are verified on the NITC Mainframe. Access is restricted down to the state/servicing office level. With proper access, authorized users can retrieve data with by personal identifier.</p> <p><b>MINC:</b> Data is retrieved by MINC authorized users through Level 2 login IDs that are verified within eAuthentication Security. Access is restricted down to management agent level. With proper access, authorized users can retrieve data with by personal identifier.</p>
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> .)	DOCID:agri_003-27; SOR Notice USDA/RURAL DEVELOPMENT – 1; No date available
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

### 4 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?	N/A



## 5 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.

## Privacy Impact Assessment Authorization

### Memorandum


I have carefully assessed the Privacy Impact Assessment for the  
**Multi-Family Management**

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.

  
\_\_\_\_\_  
Glenn Boeckmann - System Owner

5-27-09  
Date

  
\_\_\_\_\_  
Brenda Dinges - Agency's Chief FOIA Officer

8/10/09  
Date

  
\_\_\_\_\_  
John Distler - Agency DCIO

8/11/09  
Date