



# **Privacy Impact Assessment (PIA)**

## **Consolidated Management System (CMS)**

**Revision: 1.04**

**Farm Service Agency**

**Date: *July 28, 2009***





Privacy Impact Assessment for  
Consolidated Management System (CMS)



## Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	July 6, 2009	Scott Tanos	<i>Initial version</i>
1.02	July 7, 2009	Scott Tanos	Populated sections 3, 4 and 5 from previous PIA
1.03	July 24, 2009	Lori Uhlhorn	Updates and Corrections
1.04	July 28, 2009	D.Brizendine	Updated owner information; updated responses for questions 2.1, 14.3, 24, 25, 26, 26.1; document review



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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 **Consolidated Management System (CMS)** 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	
Agency:	Farm Service Agency
System Name:	Consolidated Management System
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



Consolidated Management System (CMS)

Description of System:	<p>The Consolidated Management System (CMS) is an online menu-driven program that provides a mechanism to assist the APFO by automating tasks pertaining to aerial photography support. Contract Management System (CMS) is a module of CCS used in the development of solicitations for aerial photography, the evaluation of bids, selection of the most qualified bidder, monitoring and management of contracts, contract performance, and procedural updates.</p> <ul style="list-style-type: none"> <li>• The Consolidated Contracting System (CCS) is an online menu-driven program that provides a mechanism to assist the APFO by automating tasks pertaining to contract support of the aerial photography mission.</li> <li>• The Consolidated Production System (CPS) is an online menu-driven program that provides a mechanism to assist the APFO by automating operational tasks pertaining to the aerial photography mission.</li> <li>• Aerial Photography Inspection System (APIS) is a module of CPS used for maintenance and historical referencing of information pertaining to aerial photographic film received at APFO. This includes (but not limited to) physical defects, dimensional stability, film density, fiducial marks, camera and lens identification, resolution, residual chemicals, splicing, and photographic conditions (e.g., cloud cover, sun angle, snow cover, smoke, etc).</li> <li>• Geospatial Data Inspection System (GDIS) is a module of CPS used by APFO to direct the performance of quality assurance inspections on the line-work for each digitized county. If line-work is not satisfactory, the Common Land Unit (CLU) boundary is tagged to show up on a check plot as an area for the Service Center or digitizing center to examine for errors.</li> <li>• Work Order Entry System (WOES) is a module of CPS that automates the processing of work orders for aerial photography, including internal tracking of customer's orders, basic financial management of monies (receipt, billing, and refunds), departmental workload, and photographic production.</li> <li>• Inventory Control System (ICS) is a module of CMS that covers four areas of inventory control; Photographic Inventory, Photographic Equipment Parts Inventory, Property Inventory, and Office Supplies Inventory.</li> </ul> <p>Time System (TIME) module of CMS is a productivity measurement system utilized by both management and employees in the assessment of daily activities, and time and salary expended for various activities.</p>
Who owns this system? (Name, agency, contact information)	<p>Kenneth Koehler FSA/ITSD/DAFP/APFO 801-844-2903 <a href="mailto:Kenneth.Koehler@slc.usda.gov">Kenneth.Koehler@slc.usda.gov</a></p>



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Who is the security contact for this system? (Name, agency, contact information)	<p>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></p>
Who completed this document? (Name, agency, contact information)	<p>Lori Uhlhorn  FSA/ITSD/DAFP/APFO  801-844-2970  <a href="mailto:Lori.Uhlhorn@slc.usda.gov">Lori.Uhlhorn@slc.usda.gov</a></p>

### 3 Data Information

#### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Request for Proposal, Request for Quote, Proposal, Purchase Order Information, Imagery Inspection Data, Contractual Findings
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <b>TIN'S</b> <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	Federal Acquisition Register – SubPart 4.9- Taxpayer Identification Number 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



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No.	Question	Response
4	Sources of the data in the system.	<p>All APFO personnel are granted read access to CMS data. The Management, Data, and Photographic Services Branches are the primary users of ICS and are granted read and limited write access to their specific data and will be prevented from modifying other data. All APFO employees who charge their labor to specific tasks use TIME to do so. Access to the COMP application is limited to personnel with contract related responsibilities. Inserts, updates, and delete access is limited by user roles as defined by the Contracting Officer. Read only access is provided on some aspects of the data to all APFO personnel.</p> <p>Access to the CMS application is limited to personnel with contract related responsibilities. Inserts, updates, and delete access is limited by user roles as defined by the Contracting Officer. Read only access is provided on some aspects of the data to all APFO personnel.</p>
4.1	What data is being collected from the customer?	The customer's shipping address, email address, fax, phone and preferred payment method. Contract proposal's
4.2	What USDA agencies are providing data for use in the system?	N/A
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.	<input type="checkbox"/> Yes <input checked="" 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?	





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No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	

### 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?	APFO's geospatial data is used for emergency planning, disaster response, census, agriculture, event security
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?	
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 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)?	<input type="checkbox"/> Yes <input checked="" 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 checked="" type="checkbox"/> No



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No.	Question	Response
9.3	How will the new data be verified for relevance and accuracy?	SSN numbers are collected only on those individuals requesting a cash refund. Only sales employees granted the WOREFUND role have access to the screen required to enter the data
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?	APFO's geospatial data is used for emergency planning, disaster response, census, agriculture, event security
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 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?	The data is consolidated by design. Centralized Oracle relational database instance with authentication methods are being employed. Permissions are set within the database structure to keep unauthorized queries and programs from accessing data
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?	Data is consolidated by design, not by process



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### 3.3 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?	Contracting data is maintained for 6 years. All other data is retained indefinitely
14.2	What are the procedures for purging the data at the end of the retention period?	Manual processes exist for archiving the data off-site for the six-year financial data requirement. At the end of the retention requirement the media is destroyed using a DoD grade degausser
14.3	Where are these procedures documented?	Federal Acquisition Register – SubPart 4.7- Contractor Records Retention
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?	Data structure, permissions, and activity auditing ensure data integrity
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?	Geospatial data produced by APFO is in the Public Domain.



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No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	Geospatial data produced by APFO is in the Public Domain. APFO assures thru roles and ACL's that requestors are restricted to read only
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" 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?	
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?	

### 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.)?	All APFO Personnel, Developers, DBA's, SA's, external Federal, Commercial and Private Customers
21	How will user access to the data be determined?	Access is determined by the user's position within APFO and controlled via role-based authentication. This access is documented within the administrator's manual. Access by external customers is managed thru ACL's and new accounts are approved by IT Manager prior to creation. Direct Access to data is restricted via ACL's and configured thru server services as opposed direct access from user's accounts. When a request for data is made, the system creates "pseudo links" where the data can be downloaded.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



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No.	Question	Response
22	How will user access to the data be restricted?	Read only access is granted to all APFO employees and customers.
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?	By contacting John Underwood, Privacy Officer, at <a href="mailto:john.underwood@kcc.usda.gov">john.underwood@kcc.usda.gov</a> & 816.926.6992
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, Common FSA incident reporting process. – 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.	
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?	



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No.	Question	Response
28	How will the system and its use ensure equitable treatment of customers?	Audit logs exist for data access and role based authentication methods are employed. Data gathered does not identify personal characteristics of customers or employees.
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 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.)?	Primary access to the system is through the Exceed Corporation's Hummingbird terminal emulation program, which allows a menu driven application interface. The menu was developed using the following Oracle applications, SQL Report Writer, and SQL Forms, as the front-end interface with the Oracle RDBMS. PDS system is controlled, administered, and maintained by APFO
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> .)	Subsidiary Personnel, Pay and Travel Records, USDA/FSA-11 Applicant/Borrower, USDA/FSA-14
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



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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)?	<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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## 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.