



**Privacy Impact Assessment  
(PIA)  
Direct Counter-Cyclical Enrollment &  
Payment System (DCP)  
DCP/ACRE Signup (DCP-S)**

**Revision: *Final***



**Farm Service Agency**

***Date: December 21, 2009***



## Document Information

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| Document Revision and History |            |                  |  |
|-------------------------------|------------|------------------|--|
| Revision                      | Date       | Author           | Comments   |
|                               | 11/13/2009 | S. Timbrook, ECS | <i>Original Document</i>                               |
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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 **Direct Counter-Cyclical Enrollment & Payment System (DCP)-DCP/ACRE Signup (DCP-S)** 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 (DCP)-<br>DCP/ACRE Signup (DCP-S)   |
| System Type:                             | Major Application<br>General Support System<br>Non-major Application  |
| System Categorization<br>(per FIPS 199): | High<br>Moderate<br>Low   |
| Description of System:                   | <p>The DCP/ACRE signup integrated process provides eligible producers on farms to enroll or be automatically enrolled for the 2008 through 2012 crop years. DCP is authorized by the Food, Conservation and Energy Act of 2008 (2008 Farm Bill) and is administered by the U.S. Department of Agriculture's Farm Service Agency (FSA). In order for the farmers to be eligible for this service, sign up is required. The services provided include, but are not limited to, authorizing direct and counter-cyclical payments to enrolled farmers.</p> <p>The Farm Service Agency administers Average Crop Revenue Election (ACRE), a new program authorized by the 2008 Farm Bill that begins in crop year 2009. Through ACRE, USDA offers producers an alternative to Direct and Counter-cyclical (DCP) payments. The ACRE alternative provides eligible producers a state-level revenue guarantee, based on the 5-year state Olympic average yield and the 2-year national average price. ACRE payments are made when both state- and farm-level triggers are met. By participating in ACRE, producers elect to forgo counter-cyclical payments, receive a 20-percent reduction in direct payments and a 30- percent reduction in loan rates. ACRE sign-up dates will be announced soon, or a producer can choose to stay with DCP. A decision to elect ACRE binds the producer to the program through the 2012 crop year, the last crop year covered by the 2008 Farm Bill.</p> <p>Producers must make an election to participate in ACRE before they can enroll in an ACRE contract. This is a one time election. All producers on the farm must make the same election before the farm can be enrolled in ACRE. Once the election to participate in ACRE is made, the farm is no longer eligible for DCP. Also ACRE will have to ensure an application is not already created in DCP.</p> |



|   |  |
|---|--|
| <p>Who owns this system?<br/>(Name, agency, contact information)</p>                        | <p>Sandy Bryant, Branch Chief, CBP, WDC<br/>ITSD/ADC/PARMO<br/>U.S. Department of Agriculture<br/>Farm Service Agency<br/>1400 Independence AVE. SW 4754-S<br/>Washington DC, 20250<br/>(202) 720-4380<br/><a href="mailto:Sandy.Bryant@wdc.usda.gov">Sandy.Bryant@wdc.usda.gov</a></p>            |
| <p>Who is the security contact for this system?<br/>(Name, agency, contact information)</p> | <p>Brian Davies<br/>Information System Security Program Manager (IS SPM)<br/>U.S. Department of Agriculture<br/>Farm Service Agency<br/>1400 Independence Avenue SW<br/>Washington, D.C. 20250<br/>(202) 720-2419<br/><a href="mailto:brian.davies@wdc.usda.gov">brian.davies@wdc.usda.gov</a></p> |
| <p>Who completed this document? (Name, agency, contact information)</p>                     | <p>David Murphy<br/>PARMO<br/>816-926-2168<br/><a href="mailto:David.murphy@kcc.usda.gov">David.murphy@kcc.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.   | 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<br>No – If NO, go to question 3.  |

|     |   |  |
|-----|---|--|
| 2.1 | State the law or regulation that requires the collection of this information. |  |
|-----|---|--|



Privacy Impact Assessment for Direct Counter-Cyclical Enrollment & Payment System (DCP) - DCP/ACRE Signup (DCP-S)




| No. | Question  | Response   |
|-----|---|--|
| 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<br>s<br>No   |
| 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?   | Producer/member share data applicable to each crop, advance direct payment month and year, first and/or second advance counter cyclical request, and refuse payment 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?   | 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<br>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 updates 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

| Question | Response |
|----------|----------|
|----------|----------|



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| 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 enable eligible producers on farms to sign up/enroll in the DCP or ACRE program. |
| 7   | Will the data be used for any other purpose?   | Yes<br>No – If NO, go to question 8.  |
| 7.1 | What are the other purposes?   | N/A   |
| 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<br>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<br>No – If NO, go to question 10.   |
| 9.1 | Will the new data be placed in the individual’s record (customer or employee)?   | Yes<br>No   |
| 9.2 | Can the system make determinations about customers or employees that would not be possible without the new data?   | Yes<br>No   |
| 9.3 | How will the new data be verified for relevance and accuracy?  | N/A   |
| 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 enable eligible producers on farms to signup for the DCP or ACRE program.        |



|      |  |                                       |
|------|--|---------------------------------------|
| 11   | Will the data be used for any other uses (routine or otherwise)? | Yes<br>No – If NO, go to question 12. |
| 11.1 | What are the other uses?   | N/A                                   |



| No.  | Question  | Response  |
|------|---|---|
| 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<br>No – If NO, go to question 13.   |
| 12.1 | What controls are in place to protect the data and prevent unauthorized access?   | Role-based security within the application. Other users are restricted by based on id level security granted through eAuth/EAS and database administrators. |
| 13   | Are processes being consolidated?   | Yes<br>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<br>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? | Data is always kept synchronized between SCIMS and Farm Records. |
| 16   | Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?  | Yes<br>No  |

### 3.4 Data Sharing

| Question | Response |
|----------|----------|
|----------|----------|



| 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<br>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<br>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? | N/A                                   |
| 19   | Is the system operated in more than one site?  | Yes<br>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                                   |

### 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?  | 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. Access must be requested through FSA-13A security forms with justification. eAuth level 2 is required. |
| 21.1 | Are criteria, procedures, controls, and responsibilities regarding user access documented?                       | Yes<br>s<br>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.  |



| No.  | Question  | Response  |
|------|---|-----------|
| 22.1 | Are procedures in place to detect or deter browsing or unauthorized user access?  | Yes       |
| 23   | Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)? | Yes<br>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.<br>Database Management Office (DBMO)   |
| 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<br>By contacting John W. Underwood, Privacy Officer, at<br>FSA Privacy Act Officer / FSA PII Officer<br>USDA - Farm Service Agency<br>Beacon Facility - Mail Stop 8388<br>9240 Troost Avenue<br>Kansas City, Missouri 64131-3055<br>Phone: 816-926-6992<br>Cell: 816-564-8938<br>Fax: 816-448-5833<br><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.<br>No   |
| 26.1 | If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.  | N/A  |



| No.  | Question  | Response   |
|------|---|--|
| 27   | Consider the following:<br>Consolidation and linkage of files and systems<br>Derivation of data<br>Accelerated information processing and decision making<br>Use of new technologies<br>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)? | Yes<br>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?  | 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<br>No – If NO, go to question 30   |
| 29.1 | Explain   | N/A  |

## 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<br>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.)?  | 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 <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)                         | USDA/FSA-2, Farm Records File (Automated)<br>USDA/FSA-14, Applicant/Borrower              |
| 30.3 | If the system is being modified, will the SOR require amendment or revision?  | Ye<br>s<br>No   |

## 5 Technology

| No.  | Question  | Response  |
|------|---|---|
| 31   | Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)? | Yes<br>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.



Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Direct Counter-Cyclical Enrollment & Payment System (DCP)-DCP/ACRE Signup (DCP-S)

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 signature, System Manager/Owner, Date: 1-14-10

John W. Underwood signature, Agency's Chief FOIA officer, Date: 1/22/10

Signature for Jim Gwinn, Agency CIO, Date: 1/27/2010





## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

### **Direct Counter-Cyclical Enrollment & Payment System (DCP)-DCP/ACRE Signup (DCP-S)**

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  
System Manager/Owner

\_\_\_\_\_  
Date



Privacy Impact Assessment for Direct Counter-Cyclical Enrollment  
& Payment System (DCP) - DCP/ACRE Signup (DCP-S)



John W. Underwood  
Agency's Chief FOIA officer

Date

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Jim Gwinn  
Agency CIO

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Date