



Privacy Impact Assessment

FGISonline

**Grain Inspection, Packers and
Stockyards Administration (GIPSA)**

Date: June 18, 2009



Document Information

Owner Details	
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Name	Title	Agency/Office	Contact Information



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1 System Information

System Information	
Agency:	Grain Inspection, Packers and Stockyards Administration (GIPSA)
System Name:	FGISonline
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>GIPSA's FGISonline is a portfolio of online business applications that is changing the way that the Federal Grain Inspection Service (FGIS) does business by improving internal business operations and better serving the customers of the Department of Agriculture's official grain inspection and weighing service.</p> <p>Delegation, Designation, and Export Registration State and private entities can apply online to become official service providers and can register online with FGIS as grain exporters.</p> <p>Certificates FGIS and official service providers can enter inspection and weighing results electronically, and produce electronic or paper official inspection and weighing certificates. This program feeds data into the FGIS Inspection Data Warehouse application.</p> <p>Inspection Data Warehouse Customers can access the data via FGISonline to view individual service records, or to arrange for daily data transmissions of inspection and weighing records. The database contains the inspection and weighing records for official services performed under the United States Grain Standards Act (USGSA) (7 U.S.C. 71 et seq.) and the Agricultural Marketing Act of 1946 (AMA) (7 U.S.C 1621-1627).</p> <p>Customer Information Management Customers set up an account and manage their information in FGISonline. Customers can request a customer number; set up access for their company's primary and secondary users; and request access to a customer's information. In addition, FGISonline customers can manage their data contained in the Inspection Data Warehouse.</p> <p>Equipment Capability Testing Service providers can record information on equipment used for the testing of grain quality, and its location, for the purposes of notifying, submitting, and capturing test results conducted to validate the equipment's capability to accurately test grain quality.</p> <p>Issue Tracking Project managers, developers, and user teams can enter and track all issues, requirements, defects, suggestions, and enhancements for FGIS projects. They can record and capture when an issue was first identified and when and how it was resolved.</p> <p>GAM Authorization This application controls user access to FGISonline applications through USDA's e-</p>



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	<p>Authentication system, which assigns access rights to users. Application administrators manage access to applications and types of access to those applications.</p> <p>Organization and Personnel Reflects information about GIPSA's organizational structure, employee names, office addresses, telephone numbers, and service locations.</p> <p>Code Variable Maintenance Maintains the code variables that are used across the applications so they all use the same names, definitions, and properties.</p> <p>Agricultural Product Standards (APS) Provides information on agricultural products under the authority or interest of FGIS. APS shows the hierarchy of products, commodities, classes, and subclasses for FGIS. APS further supports FGIS by providing additional information on the factors, grades, and grade limits for those products under FGIS authority.</p> <p>Inspection, Testing, and Weighing Captures all testing and weighing results for grain, rice, pulses, graded commodities, and processed commodities, as well as single and aggregate lot inspection (combined, warehouse, local, composite, and cu-sum) for all carrier types including railcars, containers, trucks, ships, and barges.</p> <p>FGIS Official Service Provider Licensing (FOL) Automates the process for licensing individuals under the USGSA and AMA to perform official functions; maintains records of licensees; applicants for a license can apply online; and official agency personnel can administer licensing examinations for samplers and technicians using the study materials, examinations, and score sheets that are provided online.</p> <p>Quality Assurance and Control FGIS will use this application to review statistical information immediately to measure the performance of the official grain inspection system.</p>
<p>Who owns this system? (Name, agency, contact information)</p>	<p>Randall Jones, Deputy Administrator, FGIS-GIPSA, 202-720-9170</p>
<p>Who is the security contact for this system? (Name, agency, contact information)</p>	<p>Brian Hughes, GIPSA ISSPM, 202-205-8150</p>
<p>Who completed this document? (Name, agency, contact information)</p>	<p>Karen Guagliardo, FGISonline Program Manager, GIPSA, 202-720-7312 Joanne Peterson, GIPSA Privacy Act Officer, 202-720-8087</p>



2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Official grain inspection and weighing information, as well as data related to standards, equipment, locations and performance of the official grain system. Information regarding individuals licensed under the USGSA; information regarding GIPSA's organizational structure, personnel, and service locations.
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.	FGIS customers, FGIS personnel at service locations and headquarters, official service providers (OSP) that GIPSA designates to provide official inspection services under the USGSA, individuals licensed under the USGSA, and registered exporters.
4.1	What data is being collected from the customer?	Business locations and officials of grain firms; official inspection and weighing data, equipment, licensees' information, business locations, and the names of business officials.
4.2	What USDA agencies are providing data for use in the system?	Office of Chief Information Officer provides data for the Organization and Personnel module of FGISonline.
4.3	What state and local agencies are providing data for use in the system?	State departments of agriculture that are OSPs provide information stated in 4.1.
4.4	From what other third party sources is data being collected?	Licensees, OSPs, and companies that are registered to export grain.
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?	System has series of data validation rules. Users are responsible for checking data prior to submission. Some systems have manual review of information. FGIS also conducts audits of OSP's where data will be reviewed.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Same as 5.1



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No.	Question	Response
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Same as 5.1

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?	Individuals who seek to become a licensee under the USGSA submit an Application for License to initiate the licensing process. Licensing records are maintained and are updated on every licensee and include licensing examinations. Statistical inspection data is maintained to review and to ensure licensees' and Agricultural Commodity Graders' (ACGs) grading accuracy.
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 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?	Initiate the application process for an individual to be licensed under the USGSA; provide official inspection and weighing certification; ensure the accuracy of the official grain inspection system; maintain statistical inspection data; ensure licensees' and ACG's grading accuracy.
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?	



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?	<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?	USDA e-authentication, e-authorization (role-based access), USDA firewall.
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?	USDA e-authentication, e-authorization (role-based access), and the USDA firewall.

2.3 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?	Records are date and time stamped. The system tracks updates to data. Business processes determine relevance.
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

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, 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?	USDA's Agricultural Marketing Service and Farm Services Agency use information to verify grain quality of shipments for contracts.



No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	System administrators grant access to records related only to other agencies.
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
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?	

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.)?	Users, managers, system administrators, FGIS customers.
21	How will user access to the data be determined?	System/application administrators.
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?	USDA e-authentication, e-authorization.
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 type="checkbox"/> Yes <input checked="" 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.)?	GIPSA, FMD, Field Operations and Support Staff
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Contact: Joanne Peterson, GIPSA FOIA and PA Officer 1400 Independence Avenue, SW, Room 1640 Washington, D.C. 20250 202-720-8087 Joanne.C.Peterson@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.
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: <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 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?	Strict role-based access governed by GIPSA policy.
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	



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.)?	Licenseses' name and/or license number Agricultural Commodity Graders' names
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 .)	This is a new System of Record.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input 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?	



Privacy Impact Assessment Authorization

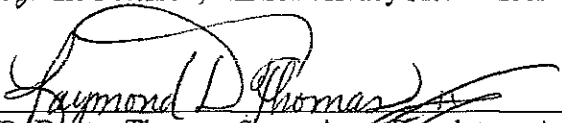
I have carefully assessed the Grain Inspection, Packers and Stockyards Administration's Privacy Impact Assessment for **FGISonline**.

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

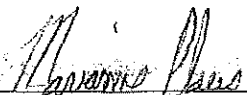
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.


Joanne Peterson, GIPSA Privacy Act Officer

6/24/09
Date


R. Dexter Thomas, Supervisory Regulatory Analyst
Management Support Staff (MSS), GIPSA

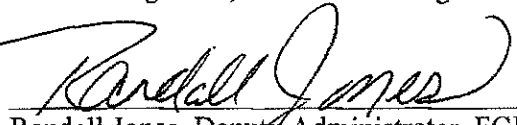
6/24/09
Date


Marianne Plaus, Acting Director, MSS

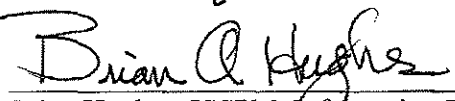
6/26/09
Date


Karen Guagliardo, FGISonline Program Manager

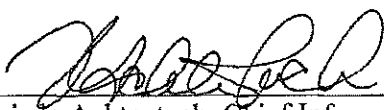
6/29/09
Date


Randall Jones, Deputy Administrator, FGIS-GIPSA
FGISonline System Owner

7/14/09
Date


Brian Hughes, ISSPM, Information Technology Staff, GIPSA

7/14/09
Date


Frieda Achtentuch, Chief Information Officer, GIPSA

7-14-09
Date