



Privacy Impact Assessment

RD eGovernment Services

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USDA Rural Development

September 2009

Document Information

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| 1.0 | July 2009 | Steve Connolly | New document |
| 1.1 | Sep 2009 | Steve Connolly | Incorporated textual corrections throughout document. |

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1 System Information

| System Information | |
|---------------------------------------|--|
| Agency: | USDA Rural Development (RD) |
| System Name: | RD eGovernment Services |
| 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>eGov is a group of applications available to the public to support eGovernment initiatives. It consists of the following subsystems: eForms, eGov Support, eService, Properties, and Web Presence. The following modules within those sub-systems are the only parts requiring a PIA per the results of individual PTAs.</p> <p>eForms Subsystem</p> <p>eForms is a web-based system created to lessen the public paperwork burden. This is mandated by the Paperwork Reduction Act and more recently, as part of the Administration's regulatory reform efforts, former President Clinton directed Federal agencies to increase their use of electronic means of information collection and, where feasible, to decrease the frequency of reporting by the public by 50%. eForms gives customers, producers, partners, and others access to forms and account information related to USDA programs. After activating their account, customers may complete and submit documents online to local USDA Service Centers or Area Offices. EForms consists of five different modules all behind electronic authentication (eAuth) of which these three have a requirement for a PIA:</p> <ul style="list-style-type: none"> • eFileService - Level 2 eAuth protected Business to Government (B2G) secure web service allowing the batch submission of CCC-633LDP and CCC-633EZ electronic form |

| System Information | |
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| | <p>transactions. This submission is with Cenex Harvest States, Inc. (CHS).</p> <ul style="list-style-type: none"> • FormsAdmin - Level 2 eAuth protected web application providing Farm Service Agency (FSA), Natural Resource Conservation Services (NRCS), and RD employee processing of electronic service requested submitted through MyForms. • MyForms - Level 2 eAuth protected web application providing electronic service request submission to federal servicing offices. <p>Information flows associated with eForms begins with the constituents' need to submit completed forms required by numerous government programs in which they participate in to the appropriate service centers. eForms aids this process in various ways. Program participants are able to download, print and deliver the forms through conventional means or through their user level access to the USDA network and the eForms system, can submit completed forms electronically to the application database. The electronic form is in a non-editable state in this phase (New) and is reviewed for processing. During the course of the review, if any information is found to be missing/incorrect/outdated, comments are added to the packet and the form is reassigned to an editable state (Returned) for participant correction.</p> <p>eServices Subsystem</p> <p>The eServices subsystem is a collection of web services that support eGov initiatives and systems that supply customer information. The eServices subsystem consists of eight modules, of which these 6 have a requirement for a PIA:</p> <ul style="list-style-type: none"> • Authorization Authentication Security Module (AASM) is a security program that the Guaranteed system utilizes. Guaranteed has an external connection with lenders via AASM. This security program resides on the Web Farm and authenticates lenders into Guaranteed via eAuth. This external connection allows lenders limited capabilities to the Guaranteed Underwriting System (GUS) and the Guaranteed Single Family Housing Losses (SFHLosses) applications. AASM assigns more stringent controls over external users than eAuth alone. Within AASM certain lenders (Branch Representatives) can in turn assign members within their branch access to Guaranteed. Guaranteed functions include: online inquiry and transaction input; pre-application and application processing, loan making and loan servicing transaction updates, portfolio management, lender management, daily register, balancing, and program reporting; and fiscal and financial |

| System Information | |
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| | <p>reporting.</p> <ul style="list-style-type: none"> • Account Cross Reference (ACR) is a secure web service that provides masking and/or unmasking of Borrower Identification numbers (IDs) through a common lookup Tabular Data Warehouse (TDW) data store. The data store was generated using a common hash algorithm against the universe of known Borrower IDs. All communication is encrypted through Secure Socket Layer (SSL). ACR supports several request types: <ul style="list-style-type: none"> • A Borrower ID as input, • Multiple Borrower IDs as input, • A converted number representing a Borrower ID, • Multiple converted numbers representing corresponding Borrower IDs, with corresponding response types respectively: • A converted number • Multiple converted numbers • A Borrower ID • Multiple Borrower IDs • Customer Initiated Payments (CIP) is a web-based system created to allow loan payments over the internet by RD loan customers. CIP accomplishes its goal by providing secure internet connectivity to customers for making an on-line loan payment, and processes their requests through Pay.gov. The CIP flow begins with a Public request to make a loan payment. All of these eGov components integrate with USDA eAuth for authentication services, and leverage interfaces to business services provided by Commercial and Direct systems supporting loan payment authorization and loan payment processing. Finally, the CIP represent the Enterprise integration point to Pay.gov payment processing services. Pay.gov receives batch payment requests from CIP and provides a batch response. The Batch response is provided to Direct Single Family Housing Loan and Commercial financial systems for account balancing processes. • Electronic Funds Transfer (EFT) is a repository of customer banking information that is used to disburse government funds electronically to the customer's bank account. The Electronic Funds Transfer (EFT) in Automated Multi-Housing Accounting System (AMAS) |

| System Information | |
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| | <p>under Multi-Family Management (MFM) puts funds into a borrowers account. Deputy Chief Financial Office (DCFO) Cash Management maintains Program Loan Accounting System (PLAS) loans and payee information including bank account and routing numbers. Loans are set up to automatically debit on a pre-defined time schedule (monthly, quarterly, semi-annual or annual). A Treasury upload is run each business day which creates a file containing PLAS 2A transactions and associated treasury debit records. This file is sent to the mainframe and split into PLAS and treasury files. The PLAS files containing 2A transactions are sent to PLAS and the treasury file is sent to the treasury.</p> <ul style="list-style-type: none"> <p>Grants (GIM) is a web-based system created to interface with Grants.gov, a Grant Find and Apply web-based system that was one of the Presidential eGovernment Initiatives. GIM accomplishes its goal by providing USDA employees access to information and forms on a 24/7 timeframe to submission of specified Grant forms via the Internet, allowing Grant making agencies to process electronically submitted Grants more efficiently, automating the process of providing interaction through paper format and faxes. Information flows associated with GIM begins with the constituents' need to submit completed Grant Applications required by numerous government programs in which they participate in to the appropriate organization. GIM aids this process in various ways. Program participants are able to download, print and deliver the Grant Applications through Grants.gov via conventional means or through their user level access to the Health and Human Services (HHS) network and the Grants.gov system, can submit completed Grants electronically to the application database. The GIM retrieves the Grants.gov submissions and notifies corresponding agency personnel by email via that Grants are in the 'New' phase and are available on the application database for review. The electronic Grant Application is in a non-editable state in this phase (New) and is reviewed for processing. During the course of the review, if any information is found to be missing/incorrect/outdated, comments are added to the packet and the Grant Application is reassigned to a non-editable state (Not Accepted) for participant correction.</p> <p>PreAuthorized Debit (PAD) is a program used for automatic payments of loans. The PAD system takes pre-authorized funds from a Borrowers Accounts via EFT for automatic payments of loans.</p> |

| System Information | |
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| | <p>Properties Subsystem</p> <p>The Properties subsystem is a list of web sites used for listing properties for sale. The Properties subsystem consists of nine modules of which these two require a PIA:</p> <ul style="list-style-type: none"> • FSAAdmin is a web based system used to authenticate and manage all administrative user IDs that maintain the properties for sale. Users are granted access through the system owner via a secure log on to an Hypertext Transfer Protocol Secure (HTTPS) connection to a windows based server. • UserID Maintenance System is an application used by security to manage UserIDs, Passwords, and authorities for internal users for Foreclosure Real-Estate Owned (FCLREO), FSAAdmin, FSAREO, Multi-Family Housing (MFH)REO, National Office Reservation of Funds (NORF) and Income Calc. Authorizes users to enter and upload property information. RD private side and also known as SFH Administration. <p>Web Presence Subsystem</p> <p>The Web Presence subsystem is a collection of web pages used to make RD information accessible to the internet or intranet. The Web Presence subsystem consists of six modules of which these two require a PIA:</p> <ul style="list-style-type: none"> • Rurdev is a public web page to provide public information and web functionality to the general public and others for the Program Areas in RD. • TeamRD application contains the static Web pages/sites for the RD Intranet, which is used for the provision of information and documentation to carry out the business of USDA RD. |
| Who owns this system? (Name, agency, contact information) | Kathy Anderson USDA Rural Development 4300 Goodfellow Blvd. St. Louis, MO 63120 Kathy.anderson@stl.usda.gov (314) 457-5012 |

| System Information | |
|---|---|
| <p>Who is the security contact for this system? (Name, agency, contact information)</p> | <p>Eugene Texter USDA Rural Development Building 105, FC-44 4300 Goodfellow Boulevard St. Louis, MO 63120 eugene.texter@stl.usda.gov (314) -457-4778</p> <p>Brenda Dinges USDA Rural Development Building 105, FC-44 4300 Goodfellow Boulevard St. Louis, MO 63120 brenda.dinges@stl.usda.gov (314) -457-4772</p> |
| <p>Who completed this document? (Name, agency, contact information)</p> | <p>Kathy Anderson USDA Rural Development 4300 Goodfellow Blvd. St. Louis, MO 63120 Kathy.anderson@stl.usda.gov (314) 457-5012</p> |

2 Data Information

2.1 Data Collection

| No. | Question | Response |
|-----|--|---|
| 1 | Generally describe the <u>data</u> to be used in the system. | <p><u>eFile Services -</u></p> <ul style="list-style-type: none"> • Web Service supporting CCC 633 EZ transactions • Customer Information: Name and Address of Producer, Phone Number, ID Number, Crop Year, State(s) and County(s), eAuthID <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> • Customer Information: Borrower and Management Agent Identification Numbers, social security numbers, debt payment information, client names, lender names, and addresses. • Employee Information: Name, eAuthID, phone numbers, duty station and agency <p><u>MyForms</u></p> <ul style="list-style-type: none"> • Customer Information: Borrower and Management Agent Identification Numbers, social security numbers, debt payment information, client names, lender names, and addresses. • Employee Information: Name, eAuthID, phone numbers, duty station and agency <p><u>AASM</u></p> <ul style="list-style-type: none"> • Customer Information: eAuthID, lender names. <p><u>ACR</u></p> |

| No. | Question | Response |
|-----|----------|--|
| | | <ul style="list-style-type: none"> • Borrower ID Social Security Number (SSN), Converted Number (Hashed value correlating to a BorrowerID. This is NOT a data collection for update, it is used only for a query response) <p><u>CIP</u></p> <ul style="list-style-type: none"> • Customer Information: Checking Account Number, Checking Routing Number, Amount of Payment, Loan Account ID <p><u>EFT</u></p> <ul style="list-style-type: none"> • Checking Account Number, Checking Routing Number, Amount of Payment <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> • Customer Information: Organization Name, Data Universal Numbering System (DUNS) ID, Key Contacts • Employee Information: Name, eAuthID, phone numbers, agency. <p><u>PAD</u></p> <ul style="list-style-type: none"> • Banking Account Number, Banking Routing Number, Amount of Payment <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> • USDA eAuth ID, Property Address, Property Description, Property Pricing, Property Picture <p><u>UserID Maintenance</u> –</p> <ul style="list-style-type: none"> • Employee Information: User name, ID and encrypted password, application authority and location. |

| No. | Question | Response |
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| | | <p><u>Rurdev</u></p> <ul style="list-style-type: none"> • Static content describing services offered by RD, Press releases, Upcoming events, key personnel, Program contact information. <p><u>TeamRD</u></p> <ul style="list-style-type: none"> • RD Intranet site used by RD employees to find internal information regarding operations management, Policies, Directives, Job postings, and other internal guidance. |
| 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. | Paperwork Reduction Act and Section 10708 of the 2002 Farm Bill. |
| 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><u>eFile Services</u></p> <ul style="list-style-type: none"> • CCC 633 EZ data collection <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> • Notes. Comments, Return Codes. |

| No. | Question | Response |
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| | | <p><u>MyForms</u></p> <ul style="list-style-type: none"> The data represents an electronic service delivery channel that supplements existing business processes employed by County Servicing Offices for FSA, NRCS, and RD programs. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for Citizens to Mail, Fax, or Drive available electronic interactions to these County Servicing Offices. <p><u>AASM</u></p> <ul style="list-style-type: none"> USDA eAuth ID <p><u>ACR</u></p> <ul style="list-style-type: none"> The data represents a translation lookup for the set of all known Borrower IDs. Consumer systems utilize this technique to only store masked Borrower ID data. <p><u>CIP</u></p> <ul style="list-style-type: none"> The data represents an electronic service delivery channel that supplements existing business processes employed by USDA RD Loan making programs. It allows citizens to make a Loan Payment over the internet. <p><u>EFT</u></p> <ul style="list-style-type: none"> Banking Account Number, Banking Routing Number, Payment Amount <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> The data represents an electronic service delivery channel that supplements existing business processes employed by USDA Grant making programs. Government staff review data submitted through |

| No. | Question | Response |
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| | | <p>this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for citizens to mail or fax available electronic interactions to these Grant making programs.</p> <p><u>PAD</u></p> <ul style="list-style-type: none"> Banking Account Number, Banking Routing Number, Payment Amount <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> Property Information <p><u>UserID Maintenance</u> –</p> <ul style="list-style-type: none"> USDA eAuth ID <p><u>Rurdev</u></p> <ul style="list-style-type: none"> Static content <p><u>TeamRD</u></p> <ul style="list-style-type: none"> Static content |
| 4.2 | What USDA agencies are providing data for use in the system? | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> CCC 633 LDP data <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> Notes, Comments, Return Codes <p><u>MyForms</u></p> <ul style="list-style-type: none"> User supplied information on Office of Management and Budget (OMB) Approved Public Burden information collections <p>-User supplied information from USDA Employees when processing service requests.</p> <p>-The FSA and NRCS both provide additional electronic form templates and</p> |

| No. | Question | Response |
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| | | <p>configuration data for the system.</p> <p>Configuration data is:</p> <ul style="list-style-type: none"> • Program data – Program Name, Program Code, etc. • Form data – Form Prefix, Form Title, Description, Template File Name, Help Instruction File Name, OMB Control Number, Search Keys (Taxonomy associations for enhanced category based searches) <p>Program to Form relationship – The Forms a Program uses to deliver service to a constituent.</p> <p><u>AASM</u></p> <ul style="list-style-type: none"> • USDA eAuth ID <p><u>ACR</u></p> <ul style="list-style-type: none"> • None <p><u>CIP</u></p> <ul style="list-style-type: none"> • None <p><u>EFT</u></p> <ul style="list-style-type: none"> • Banking Account Number, Banking Account Routing Number, Amount of Payment <p><u>Grants:</u></p> <ul style="list-style-type: none"> • Grants.gov originated Grant Applications submitted to these participating programs: <ul style="list-style-type: none"> <u>Agency</u> Agricultural Marketing System (AMS) Animal and Plant Health Inspection Services (APHIS) Agricultural Research Service (ARS) Cooperative State Research, Education and Extension Service (CSREES) |

| No. | Question | Response |
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| | | <p>Economic Research Service (ERS) Foreign Agricultural Service (FAS) Food and Nutrition Service (FNS) National Agricultural Statistics Service (NASS) National Resource Conservation Service (NRCS) National Sheep Industry Improvement Center (NSIIC) Rural Development (RD) Risk Management Agency (RMA)</p> <p><u>PAD</u></p> <ul style="list-style-type: none"> Banking Account Number, Banking Account Routing Number, Amount of Payment <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> Property Information <p><u>UserID Maintenance</u> –</p> <ul style="list-style-type: none"> USDA eAuth ID <p><u>Rurdev</u></p> <ul style="list-style-type: none"> None <p><u>TeamRD</u></p> <ul style="list-style-type: none"> None |
| 4.3 | What state and local agencies are providing data for use in the system? | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> None <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> None <p><u>MyForms</u></p> |

| No. | Question | Response |
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| | | <ul style="list-style-type: none"> • None <p><u>AASM</u></p> <ul style="list-style-type: none"> • None <p><u>ACR</u></p> <ul style="list-style-type: none"> • None <p><u>CIP</u></p> <ul style="list-style-type: none"> • None <p><u>EFT</u></p> <ul style="list-style-type: none"> • None <p><u>Grants:</u></p> <ul style="list-style-type: none"> • HHS is the Program Management Office for www.Grants.gov. All Customer Grant data collections originate at www.Grants.gov. USDA Grantors obtain access to GIM through USDA eAuthentication Security Roles assignment through a Local Registration Authority (LRA). USDA Employees with Agency Administrator or Agency Manager roles supply more granular Application Authorization information that is not Privacy Act data, e.g., data view authority based on Catalog of Federal Domestic Assistance (CFDA) number, State, Country, etc <p><u>PAD</u></p> <ul style="list-style-type: none"> • None <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> • None <p><u>UserID Maintenance</u> –</p> <ul style="list-style-type: none"> • None |

Sensitive But Unclassified/Sensitive Security Information – Disseminate on a Need-To-Know Basis Only

| No. | Question | Response |
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| | | <p><u>Rurdev</u></p> <ul style="list-style-type: none"> • None <p><u>TeamRD</u></p> <ul style="list-style-type: none"> • None |
| 4.4 | From what other third party sources is data being collected? | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> • None <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> • None <p><u>MyForms</u></p> <ul style="list-style-type: none"> • As it relates to system data, not user supplied data, the following external authoritative sources provide system data: <ol style="list-style-type: none"> 1. Office Information Profile (OIP) – Provides Service Center Office identifiers. These identifiers represent the routing decision made by a user of the electronic form service delivery channel. 2. EmPowHR – Provides the intake process for all USDA Service Center employee profiles and subsequent authentication and authorization decisions <p><u>AASM</u></p> <ul style="list-style-type: none"> • None <p><u>ACR</u></p> <ul style="list-style-type: none"> • None <p><u>CIP</u></p> <ul style="list-style-type: none"> • As it relates to system data, not user supplied data, the following external authoritative sources provide system data: <ol style="list-style-type: none"> 1. USDA eAuth – Provides authentication profile information. |

| No. | Question | Response |
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| | | <p>2. MortgageServ – Provides Consumer loan information</p> <p>3. Rural Utilities Service Loan Servicing System (RULSS) – Provides Commercial loan information</p> <p><u>EFT</u></p> <ul style="list-style-type: none"> • None <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> • As it relates to system data, not user supplied data, the following external authoritative sources provide system data: <p>1. USDA eAuth – Provides authentication profile information.</p> <p><u>PAD</u></p> <ul style="list-style-type: none"> • None <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> • None <p><u>UserID Maintenance</u> - None</p> <ul style="list-style-type: none"> • <p><u>Rurdev</u></p> <ul style="list-style-type: none"> • None <p><u>TeamRD</u></p> <ul style="list-style-type: none"> • None |
| 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> |

| No. | Question | Response |
|-----|---|---|
| 5.1 | How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness? | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>MyForms</u></p> <ul style="list-style-type: none"> Manual inspection of electronic form information by authorized USDA Service Center employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide <p><u>AASM</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>ACR</u></p> <ul style="list-style-type: none"> Not Applicable <p><u>CIP</u></p> <ul style="list-style-type: none"> Loan customers provide a Checking Account Number, Routing Number, and Payment Amount. The Account Number and Routing Number data information is validated against DLOS or RULSS. On successful validation, this information is sent to Pay.gov for processing. Pay.gov responses are then sent to underlying loan servicing systems, Consumer and RULSS. <p><u>EFT</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> Manual inspection of Grant Application information by authorized USDA employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide. |

| No. | Question | Response |
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| | | <p><u>PAD</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>UserID Maintenance</u> –</p> <ul style="list-style-type: none"> • Data is not collected for other sources <p><u>Rurdev</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>TeamRD</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees |
| 5.2 | How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness? | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>MyForms</u></p> <ul style="list-style-type: none"> • Manual inspection of electronic form information by authorized USDA Service Center employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide. <p><u>AASM</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>ACR</u></p> |

| No. | Question | Response |
|-----|----------|---|
| | | <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>CIP</u></p> <ul style="list-style-type: none"> • Loan customers provide a Checking Account Number, Routing Number, and Payment Amount. The Account Number and Routing Number data information is validated against Consumer or RULSS. On successful validation, this information is sent to Pay.gov for processing. Pay.gov responses are then sent to underlying loan servicing systems, Consumer and RULSS. <p><u>EFT</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> • Manual inspection of Grant Application information by authorized USDA employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide. <p><u>PAD</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>UserID Maintenance</u> –</p> <ul style="list-style-type: none"> • Verify all form fields are completed <p><u>Rurdev</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees <p><u>TeamRD</u></p> <ul style="list-style-type: none"> • Manual inspection by authorized USDA employees |

| No. | Question | Response |
|-----|--|--|
| 5.3 | How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness? | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>MyForms</u></p> <ul style="list-style-type: none"> Manual inspection of electronic form information by authorized USDA Service Center employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide <p><u>AASM</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>ACR</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>CIP</u></p> <ul style="list-style-type: none"> Loan customers provide a Checking Account Number, Routing Number, and Payment Amount, this information is sent to Pay.gov for processing. Pay.gov responses are then sent to underlying loan servicing systems. <p><u>EFT</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> Manual inspection of Grant Application information by authorized USDA employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide. |

| No. | Question | Response |
|-----|----------|---|
| | | <p><u>PAD</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>UserID Maintenance</u></p> <ul style="list-style-type: none"> Data is not collected for other sources. <p><u>Rurdev</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees <p><u>TeamRD</u></p> <ul style="list-style-type: none"> Manual inspection by authorized USDA employees |

2.2 Data Use

| No. | Question | Response |
|-----|--|---|
| 6 | <p>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> | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> Loan Deficiency Payment <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> Paperwork Reduction Act and Section 10708 of the 2002 Farm Bill. <p><u>MyForms</u></p> <ul style="list-style-type: none"> Paperwork Reduction Act and Section 10708 of the 2002 Farm Bill. <p><u>AASM</u></p> <ul style="list-style-type: none"> USDA eAuthentication integration to legacy systems <p><u>ACR</u></p> |

| No. | Question | Response |
|-----|--|---|
| | | <ul style="list-style-type: none"> To provide a single point of integration for all RD systems supporting borrowerID data collections. <p><u>CIP</u></p> <ul style="list-style-type: none"> To provide a single point of integration between USDA RD and Pay.gov for collecting and processing on-line loan payments submitted through the enabled loan systems <p><u>EFT</u></p> <ul style="list-style-type: none"> Authorization of USDA to perform scheduled EFTs <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> To provide a single point of integration between USDA and Grants.gov for receiving and routing all Grant Applications submitted through the Grants.gov Apply service <p><u>PAD</u></p> <ul style="list-style-type: none"> Authorization of USDA to perform scheduled Pre-Authorized Debits. <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> Administration of FSA Properties for Sale search engine data. <p><u>UserID Maintenance</u></p> <ul style="list-style-type: none"> user information <p><u>Rurdev</u></p> <ul style="list-style-type: none"> RD national web site content <p><u>TeamRD</u></p> <ul style="list-style-type: none"> RD enterprise Intranet content |
| 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. |

| No. | Question | Response |
|-----|--|--|
| 7.1 | What are the other purposes? | None |
| 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 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 |
| 9.3 | How will the new data be verified for relevance and accuracy? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 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? | <p><u>eFile Services</u></p> <ul style="list-style-type: none"> • Loan Deficiency payments <p><u>Forms Admin</u></p> <ul style="list-style-type: none"> • County Based Agency electronic service requests. <p><u>MyForms</u></p> <ul style="list-style-type: none"> • County Based Agency electronic service requests. <p><u>AASM</u></p> |

| No. | Question | Response |
|------|--|--|
| | | <ul style="list-style-type: none"> • USDA eAuth integration to legacy systems <p><u>ACR</u></p> <ul style="list-style-type: none"> • Borrower ID masking <p><u>CIP</u></p> <ul style="list-style-type: none"> • Authorized scheduled loan payments <p><u>EFT</u></p> <ul style="list-style-type: none"> • Authorization of USDA to perform EFT <p><u>Grants (GIM):</u></p> <ul style="list-style-type: none"> • Review and disposition determination of electronic grants submitted through Grants.gov <p><u>PAD</u></p> <ul style="list-style-type: none"> • Authorization of USDA to perform Pre-Authorized Debits. <p><u>FSAAdmin</u></p> <ul style="list-style-type: none"> • Posting and maintenance of FDA property for sale <p><u>UserID Maintenance</u> –</p> <ul style="list-style-type: none"> • USDA eAuth binding <p><u>Rurdev</u></p> <ul style="list-style-type: none"> • Deployment of update or new content for RD national web site <p><u>TeamRD</u></p> <ul style="list-style-type: none"> • Deployment of update or new content for RD Intranet web site |
| 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? | 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? | <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? | Generally, the National Institute of Standards and Technology (NIST) 800-53A controls for the eGov system are discussed in detail in the System Security Plan and specifically the Access Control (AC), Identification and Authentication (IA) and Systems and Communication Protection (SC) controls are in place to prevent unauthorized access. |
| 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? | The system records an audit trail of who changes what data. This is used to identify how and when data changes were made that warrant explanation. Additionally USDA Web Farm intrusion detection and security monitoring is leveraged to prevent unauthorized access. The C&A process using the guidance of NIST SP 800-53 security controls provide additional internal protection of data. |

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. |

| No. | Question | Response |
|------|---|---|
| 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? | Manual inspection by authorized USDA employees and/or contractors for all modules listed in this document is used for determining if the data is still accurate, etc. |
| 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? | <p>Data is NOT used by any other agency for these modules: eFile Services, Forms Admin, AASM, ACR, CIP, EFT, PAD, FSAAdmin, UserID Maintenance, Rurdev, and TeamRD.</p> <p><u>MyForms</u></p> <ul style="list-style-type: none"> The data represents an electronic service delivery channel that |

| No. | Question | Response |
|------|--|---|
| | | <p>supplements existing business processes employed at County Servicing Offices for FSA, NRCS, and RD programs. FSA and NRCS send their information to RD and an ISA is their responsibility. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for citizens to mail or fax available electronic interactions to these County Servicing Offices.</p> <p>Grants:</p> <p>The data represents an electronic service delivery channel that supplements existing business processes employed at USDA Grant making programs. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for citizens to mail or fax available electronic interactions to these Grant making programs.</p> |
| 17.2 | Who is responsible for assuring the other agency properly uses the data? | Kathy Anderson Chief, Enterprise Technologies and Services 4300 Goodfellow, FC-425 St. Louis, MO 63120 (314)457-5012 Kathy.Anderson@stl.usda.gov |
| 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? | Interconnection Service Agreement and Memorandum of Understanding agreements are in place (in Cyber Security Assessment and Management (CSAM)) and maintained by the Information Systems Security Staff (ISSS). |

| No. | Question | Response |
|------|--|--|
| 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.)? | Users, employees, managers, system administrators and developers will have access to the data in the system. |
| 21 | How will user access to the data be determined? | Access is controlled by User ID and password. Access rights are granted to designated individuals only when their supervisor or the site system manager approves a written request. Privileges granted are based on job functions and area of authority (e.g. State office user with authority for their state only). |
| 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? | eGov systems leverage Role Based Access Control and Certificate based Mutual Authentication for enforcing assigned authorizations for controlling access to the system. Users do not have access to ALL DATA on the system. They can only access information that belongs to them. Privileges granted are based on job functions and area of authority (e.g. State office user with |

| No. | Question | Response |
|------|---|--|
| | | authority for their state only). |
| 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.)? | Kathy Anderson Chief, Enterprise Technologies and Services Building 104, FC-425 4300 Goodfellow Boulevard St. Louis, MO Office: 314-457-5012 Kathy.Anderson@stl.usda.gov |
| 25 | How can customers and employees contact the office or person responsible for protecting their privacy rights? | Citizens and employees may contact the Freedom of Information Officer: Andrea Jenkins, Freedom of Information Officer Rural Development, USDA 7th Floor, Reporter's Bldg. Washington, DC 20250 Andrea.Jenkins@wdc.usda.gov (202) 692-0029 |
| 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 <ul style="list-style-type: none"> • USDA Incident Notification Plan September 2007 • Departmental Manual (DM)3505-001 USDA Computer Incident Response Procedures Manual. • Computer Incident Response Standard Operating Procedures (CIRT) |

| No. | Question | Response |
|------|---|---|
| 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"> ▪ 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? | N/A |
| 28 | How will the system and its use ensure equitable treatment of customers? | <p><u>DM 3515-002, section e states:</u></p> <p>To fulfill the commitment of the USDA to protect customer and employee data, several issues must be addressed with respect to privacy:</p> <ol style="list-style-type: none"> 1 The use of information must be controlled; and 2 Information may be used only for a necessary and lawful purpose. <p>Where Public Affairs systems of records are involved:</p> <ol style="list-style-type: none"> 1 Individuals must be informed in writing of the principal purpose and routine uses of the information being collected from them; 2 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 3 Any information used must be sufficiently accurate, relevant, timely, |

| No. | Question | Response |
|------|---|---|
| | | and complete to assure fair treatment of the individual. 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. |
| 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 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 (i.e., employee number, social security number, etc.)? | N/A |
| 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 .) | N/A |
| 30.3 | If the system is being modified, will the SOR | <input type="checkbox"/> Yes – As needed |

| No. | Question | Response |
|-----|--------------------------------|------------------------------------|
| | require amendment or revision? | <input type="checkbox"/> No N/A |

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 RD eGovernment Services.

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.

Kathy Anderson - System Manager/Owner

Date

Brenda Dinges – Designated Privacy Contact

Date

John Distler - Agency DCIO

Date