



**Privacy Impact Assessment
(PIA)
Ag Credit System
(Ag Credit)**

Revision: *Final*



Farm Service Agency

Date: *September 25, 2009*



Document Information

Owner Details	
Name	Carolyn Cooksie - USDA/FSA/DAFLP/OD
Contact Number	(202) 720-4671
E-mail Address	Carolyn.Cooksie@wdc.usda.gov

Document Revision and History			
Revision	Date	Author	Comments
1.01	July 6, 2009	Scott Tanos	<i>Initial version</i>
1.02	July 9, 2009	Scott Tanos	Populated sections 3, 4 and 5 from previous PIA
1.03	July 22, 2009	D.Brizendine ISO	Updated System Owner Information
1.04	July 28, 2009	Theresa Maze	Update by application point of contact
1.05	July 31, 2009	D.Brizendine	Updated responses for 24, 25, 26, 26.1; Document review; template updates
1.06	8/4/09	D.Brizendine	Updated Owner information, System Type per Georgia Nuessle
1.07	9/01/09	D.Brizendine FSAISO	Updated responses for 4, 5, 14, 14.1, 14.2, 14.3, 27, 27.1 and 29 from John Underwood's email.
1.08	9/2/09	Theresa Maze	Updated responses for 5.1 and 5.2
Final	9/25/09	D.Brizendine FSAISO	Added completed Approval page and marked document as Final.



Table of Contents

1 PURPOSE OF DOCUMENT	5
2 SYSTEM INFORMATION	6
3 DATA INFORMATION	7
3.1 Data Collection	7
3.2 Data Use	8
3.3 Data Retention.....	9
3.4 Data Sharing	10
3.5 Data Access	11
3.6 Customer Protection.....	11
4 SYSTEM OF RECORD	12
5 TECHNOLOGY	13
6 COMPLETION INSTRUCTIONS	14

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 **Ag Credit System** 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

System Information	
Agency:	Farm Service Agency
System Name:	Ag Credit
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	AgCredit is a tracking and follow-up activity system used by county office personnel. When a borrower's loan is delinquent The AgCredit system tracks all activities related to notification and subsequent actions. Primary users of AgCredit are FLP staff at FSA Service Center Offices (SCO's). The FSA National Office uses AgCredit data in reports to Congress, USDA Office of Civil Rights, and FSA upper management.
Who owns this system? (Name, agency, contact information)	Carolyn Cooksie USDA/FSA/DAFLP/OD (202) 720-4671 Carolyn.Cooksie@wdc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (IS SPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 Brian.Davies@wdc.usda.gov
Who completed this document? (Name, agency, contact information)	Theresa Maze (816) 823-1943 Theresa.maza@kcc.usda.gov

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer-Name, Social Security Number, tax id
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	Yes No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	7 U.S.C. 135b, 450j, 450k, 405l, 1281-1393, 1421-1449, 1461-1469, 1471-1471i, 1781-1787; 15 U.S.C. 714-714p; 16 U.S.C. 590a-590q, 1301- 1311, 1501-1510, 1606, 2101-2111, 2201-2205, 3501, 3801-3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469
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 No
4	Sources of the data in the system.	Direct Loan System (DLS)
4.1	What data is being collected from the customer?	SSN, Tax ID, Name, & address Via DLS
4.2	What USDA agencies are providing data for use in the system?	OIP- employee access, Internal FLPIDS databases owned by FCAO. FSA,
4.3	What state and local agencies are providing data for use in the system?	FSA
4.4	From what other third party sources is data being collected?	None

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 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 is verified manually by employees, guidance provided by 5-FLP, Direct Loan Servicing - Special and Inventory Property Management.



No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data is verified manually by employees, guidance provided by 5-FLP, Direct Loan Servicing - Special and Inventory Property Management.
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?	Used to determine qualifications for participation in FSA's Farm Loan Programs
7	Will the data be used for any other purpose?	Yes 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	Yes s 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 No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	Yes s
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	Yes s No
9.3	How will the new data be verified for relevance and accuracy?	Spot check, audits, manual verification, system tested calculations.



No.	Question	Response
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?	Used to determine qualifications for participation in FSA's Farm Loan Programs
11	Will the data be used for any other uses (routine or otherwise)?	Yes 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?	Yes No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	User ID and Password. eAuth and EAS or within the system.
13	Are processes being consolidated?	Yes No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	User ID and Password. eAuth and EAS or within the system.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	Yes 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?	Data is stored indefinitely. Some exists until the user is deleted from the database. 5 Years on average for some systems FSA 25-AS Handbook
14.2	What are the procedures for purging the data at the end of the retention period?	Follow procedures in FSA 25-AS Handbook
14.3	Where are these procedures documented?	Follow procedures in FSA 25-AS Handbook



No.	Question	Response
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 locked down. Data is evaluated by user determination. Reports can be run as a check.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Yes s 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.)?	Yes No – If NO, go to question 18. Data is used to track activities related to notification and subsequent actions for delinquent borrower’s. All FSA users who access the data are required to sign “Rules of Behavior” and are responsible for assuring proper use of the information system.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	Yes 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?	Yes No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	For web-based applications like AgCredit, patches or fixes are done to the main program so anyone accessing the site will see the update. The web program and database are in a central location so updates would affect all at the same time.



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.)?	FSA employees, Users, managers and system administrators, developers, loan employees, State, County, National offices, will have access to system data.
21	How will user access to the data be determined?	Access if determined by user ID and password, following standard agency procedures. Role based access is built in.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes No
22	How will user access to the data be restricted?	Access is determined by roles. Some systems allow state/county access only, some have database passwords, National users may have unrestricted access
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	Yes 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 john.underwood@kcc.usda.gov & 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?	Yes – If YES, go to question 27. Common FSA incident reporting process. No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	



No.	Question	Response
27	<p>Consider the following:</p> <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 <p>Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?</p>	<p>Yes</p> <p>No – If NO, go to question 28.</p>
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	FSA guidelines for fair and equitable treatment already exist. Automated consideration or uniform calculations of all available options.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<p>Yes</p> <p>No – If NO, go to question 30</p>
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?	<p>Yes</p> <p>No – If NO, go to question 31</p>
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 will be retrieved by User ID and Password. Customer data once in the application could be retrieved by SS#, Tax ID, customer number, system assigned identifiers
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 .)	<p>USDA/FSA-2 Farm Records File Automated</p> <p>USDA/FSA-14 Applicant/Borrower</p>



No.	Question	Response
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes s 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 No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



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
Ag Credit System

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.

Carolyn B. Cooksie 8/18/09 Date
Carolyn B. Cooksie, System Owner

John W. Underwood 8/28/09
John Underwood, Chief Privacy Officer Date

James Gwinn 09/22/09
James Gwinn, FSA CIO Date