



**Privacy Impact Assessment  
(PIA)  
Subsidiary Systems  
Combined Producers System (CPS)**

**Revision: 1.01**



**Farm Service Agency**

**Date: *May 13, 2010***





## Document Information

Business Owner Details	
Name	Sandy Bryant, FSA-DAFP-PECD-CPB
Contact Number	(202) 720-4380
E-mail Address	<a href="mailto:Sandy.Bryant@wdc.usda.gov">Sandy.Bryant@wdc.usda.gov</a>

Document Revision and History			
Revision	Date	Author	Comments
1.01	May 13, 2010	Anita Trader, ISO DR	Initial version for 2010 populated from 2009 PIA
1.02	June 14, 2010	E. Shaner, ISO C&A	Reviewed for standard responses
1.03	June 15, 2010	Judy Sobbing, ECS	Reviewed and updated, if warranted
	June 30, 2010	C. Niffen	Made changes per John Underwood for questions 4, 4.1, 4.2, 6, 10

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# 1 Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner’s requirements presents any threats to privacy.”

The Privacy Impact Assessment (PIA) document contains information on how the Privacy Impact Assessment for Subsidiary Systems FISMA Child **Combined Producers 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*.

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## 2 System Information

**System Information**

System Information	
Agency:	Farm Service Agency.
System Name:	Subsidiary Systems Combined Producers System.
System Type:	Major Application
	General Support System
	Non-major Application
System Categorization (per FIPS 199):	High
	Moderate
	Low
Description of System:	This system combines producers as one entity, typically for husband and wife ownership or when a single producer has controlling interest.
Who owns this system? (Name, agency, contact information)	Sharon Lovelace Chief, Farm Records Group USDA/F SA/ADC/PARMO/FRG 6501 Beacon Drive Kansas City MO 64133 (816) 926-2115 <a href="mailto:Sharon.Lovelace@kcc.usda.gov">Sharon.Lovelace@kcc.usda.gov</a>
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) USDA/F SA/ITSD/ISO 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 <a href="mailto:brian.davies@wdc.usda.gov">brian.davies@wdc.usda.gov</a>
Who completed this document? (Name, agency, contact information)	P. Siemiatkowski PARMO/FRG 6501 Beacon Drive Kansas City MO 64133 (816) 926-2117 <a href="mailto:Pamela.Siemiatkowski@kcc.usda.gov">Pamela.Siemiatkowski@kcc.usda.gov</a>



## 3 Data Information

### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer data is used to track who is considered for payment limitation purposes. The system will track who is combined with whom, why and when they were combined.  Employee information is used to track who set up the combination and who dissolved it. The data actually tracked is the employee user ID and the date they did the work.  Other data kept will be the counties the producers are associated with and which county controls the combined data for those producers in the combination.
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.	The Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397.
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.	Employees will provide their user name and the time they made any changes to the records
4.1	What data is being collected from the customer?	Customers provide the data identified on the CC-5 02 farm operating plan.
4.2	What USDA agencies are providing data for use in the system?	USDA agencies with SCIMS update rights (Farm Service Agency, Natural Resource Conservation Service, and Rural Development).
4.3	What state and local agencies are providing data for use in the system?	None.
4.4	From what other third party sources is data being collected?	None.

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No.	Question	Response
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 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?	Data collected from USDA sources is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.
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

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 track combination(s) of producers as one entity for payment limitation purposes.
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?	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 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

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No.	Question	Response
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	Yes
		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 track combination(s) of producers as one entity for payment limitation purposes.
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?	N/A.
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?	N/A.
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?	N/A.

### 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?	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.

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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?	The data is year specific and is valid as long as the CC-5 02 is signed and on file at the county service center.
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.
17.1	How will the data be used by the other agency?	To help determine payment limitations for other agency programs.
17.2	Who is responsible for assuring the other agency properly uses the data?	The other agency's internal control/processing methodology.
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?	N/A.
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?	Administrative controls and procedures are established to maintain consistent system use.

### 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.)?	Only authorized FSA Users, FSA System Administrators, and FSA DBAs.
21	How will user access to the data be determined?	Access must be requested through FSA- 1 3A security forms with justification and approval.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes.

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No.	Question	Response
22	How will user access to the data be restricted?	Identification and Authentication are performed by both the OS/400 and SSP operating systems. Access is further restricted by the S36 partition and the local data residing on the distributed unit (i.e., service center).
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 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.)?	FSA Privacy Act Officer/FSA PII Officer.
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 By contacting John W. Underwood, Privacy Officer, at FSA Privacy Act Officer / FSA PII Officer USDA - Farm Service Agency Beacon Facility - Mail Stop 8388 9240 Troost Avenue Kansas City, Missouri 6413 1-3055 Phone: 816-926-6992 Cell: 816-564-8950 Fax: 816-448-5833 <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. No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	N/A.

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No.	Question	Response
27	Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	Yes 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?	By providing a centralized and standardized method of developing program decisions.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	Yes No – If NO, go to question 30.
29.1	Explain	N/A.

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## 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
		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.)?	The data can only be retrieved using internal record identifiers such as customer name, tax id, or farm number.
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)
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes
		No

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## 5 Technology

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



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## Privacy Impact Assessment Authori Memorandum

I have carefully ass  hg ra  r the  
Subsidiary Systems Combined Producers 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.

  
Sharon Lovelace, Information System O

6-24-10

  
John Underwood, Chief Privacy Officer

Date 6/2

  
James Gwynn, FSA CIO

Date 7/8/2010

e: May 13, 2010