



**Privacy Impact Assessment
(PIA)
Electronic Distribution of Disbursement Data
ED3**

Revision: 1.0



Farm Service Agency

Date: March 29, 2010



Document Information

| Business Owner Details | |
|------------------------|--|
| Name | Steve Sanders |
| Contact Number | 816-926-6301 |
| E-mail Address | Steve.Sanders@kcc.usda.gov |

| Document Revision and History | | | |
|-------------------------------|-------------|--------------|---|
| Revision | Date | Author | Comments |
| 1.0 | 03/29/20 10 | T. Ostrander | Populated Document |
| 1.01 | 04/13/2010 | K. Winburn | Updated and Reviewed document |
| 1.02 | 4/26/10 | T. Ostrander | Made changes per C. Niffen from John Underwood. |



Table of Contents

1 PURPOSE OF DOCUMENT 1

2 SYSTEM INFORMATION 2

3 DATA INFORMATION 3

3.1 Data Collection 3

3.2 Data Use 5

3.3 Data Retention 7

3.4 Data Sharing 7

3.5 Data Access 8

3.6 Customer Protection 8

4 TECHNOLOGY 12

5 COMPLETION INSTRUCTIONS 13



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 Electronic Distribution of Disbursement Data (ED3) 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: | Electronic Distribution of Disbursement Data |
| System Type: | Major Application |
| | General Support System |
| | Non-major Application |
| System Categorization (per FIPS 199): | High |
| | Moderate |
| | Low |
| Description of System: | <p>The Electronic Distribution of Disbursement and Invoicing Data (ED3) system provides a method for three USDA/FSA systems, currently supported by the Fund and Commodity Management Office (FCMO), to electronically transmit and collect information via the Internet. Disbursement data from the Processed Commodities Inventory Management System (PCIMS), Grain Inventory Management System (GIMS), and Centralized Disbursements System (CDS) is consolidated and made available on the Web immediately after payments are transmitted and certified. The ACH (Automated Clearing House) payees need to receive their disbursement statements as soon as possible after payment is made to allow them to identify their deposits, perform reconciliation activities, and distribute their money on a timelier basis. ED3 also has Storage Invoicing functionality. Previously, invoices were generated and mailed to the warehouse operator. The warehouse operator would review the invoice, sign the invoice certifying the information was correct and return the certification page to FCMO by mail. Once received, FCMO personnel would update the system indicating the invoice had been certified and release it for payment. In ED3, the warehouse operator receives an e-mail notification when the invoice is ready for review. The warehouse operator reviews the invoice and certifies the invoice by entering their password.</p> |
| Who owns this system? (Name, agency, contact information) | <p>Rosemary Hall U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133 (816)926-1975 Rosemary.Hall@kcc.usda.gov</p> |



| | |
|---|--|
| <p>Who is the security contact for this system? (Name, agency, contact information)</p> | <p>Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov</p> |
| <p>Who completed this document? (Name, agency, contact information)</p> | <p>Kathy Winburn U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133 (816)926-1924 Kathy.Winburn@kcc.usda.gov</p> |

3 Data Information

3.1 Data Collection

| No. | Question | Response |
|-----|---|--|
| 1 | Generally describe the data to be used in the system. | <p>Customer: Taxpayer Identification Number; bank account number; business name; business payee address for disbursements; business mailing and location address for storage invoices; contact name, phone number and email address. Contains business information only no personnel information.</p> <p>Employee: Phone number, FAX number, and authorized access information such as name, access ID, work phone number, and email addresses</p> |
| 2 | Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)? | <p>Yes</p> <p>No – If NO, go to question 3.</p> |

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



| No. | Question | Response |
|-----|---|---|
| 3 | Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President. | Yes No |
| 4 | Sources of the data in the system. | The customer provides contact name, phone number, and email address when registering. All other data comes from PCIMS, GIMS, CDS, SCIMS. |
| 4.1 | What data is being collected from the customer? | ED3 does not actually collect data. PCIMS GIMS, and CDS supplies ED3 with the following information - Taxpayer Identification Number; bank account number; business name; business payee address for disbursements; business mailing and location address for storage invoices; contact name, phone number and email address. Contains business information only no personnel information |
| 4.2 | What USDA agencies are providing data for use in the system? | USDA/FSA |
| 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? | Vendors, carriers, warehousemen, producers. |
| 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 the customer 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. |
| 5.2 | 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. |



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

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? | The Electronic Distribution of Disbursement Data (ED3) system provides a method for three USDA/FSA systems currently supported by the Fund and Commodity Management Office (FCMO) to electronically transmit and collect information via the Internet. Disbursement data from the Processed Commodities Inventory Management System (PCIMS), Grain Inventory Management System (GIMS), and Centralized Disbursements System (CDS) is consolidated and made available on the Web immediately after payments are transmitted and certified. |
| 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 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 No |



| 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? | |
| 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? | The Electronic Distribution of Disbursement Data (ED3) system provides a method for three USDA/FSA systems currently supported by the Fund and Commodity Management Office (FCMO) to electronically transmit and collect information via the Internet. Disbursement data from the Processed Commodities Inventory Management System (PCIMS), Grain Inventory Management System (GIMS), and Centralized Disbursements System (CDS) is consolidated and made available on the Web immediately after payments are transmitted and certified. |
| 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’s access is restricted by role-based internal access security controls within the application |
| 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’s access is restricted by role-based internal access security controls within the application |



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 retained for 10 years |
| 14.2 | What are the procedures for purging the data at the end of the retention period? | According to NITC policy and procedures |
| 14.3 | Where are these procedures documented? | NITC |
| 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 customer maintains his or her own contact name, phone number, and email address. The TIN, bank account info, and all addresses come from the legacy feeder systems (PCIMS, GIMS, CDS, and SCIMS). Employee names, phone and fax numbers, and emails are maintained by the administrative users. |
| 16 | Is the data retained in the system the minimum necessary for the proper performance of a documented agency function? | Yes |
| | | 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? | |
| 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. |



| No. | Question | Response |
|------|--|----------|
| 19.1 | How will consistent use of the system and data be maintained in all sites? | |

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.)? | Production update: Customers, internal users, System Administrators. Production inquiry: Developers. Test update/inquiry: Internal users, System Administrators, and developers |
| 21 | How will user access to the data be determined? | By using FSA's standard user ID and password security with logins verified through eAuth and EAS. |
| 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 restricted through role-based user ID and password security controls within the application. |
| 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 s 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.)? | System owners; all authorized personnel to whom access has been granted |



| No. | Question | Response |
|------|---|--|
| 25 | How can customers and employees contact the office or person responsible for protecting their privacy rights? | <p>Contact the ED3 helpdesk at 816-926-2120 or send an email to ed3@kcc.usda.gov from the website.</p> <p>The ED3 Helpdesk operates during regular business hours. Its purpose is to help users with accessing and navigating the system. The helpdesk will also document any system related issues that the users are experiencing and provide them to the technical development team.</p> <p>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 mailto:john.underwood@kcc.usda.gov</p> |
| 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? | <p>Yes – If YES, go to question 27.</p> <p>No</p> |
| 26.1 | If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date. | |
| 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> |



| No. | Question | Response |
|------|---|---|
| 27.1 | Explain how this will be mitigated? | |
| 28 | How will the system and its use ensure equitable treatment of customers? | By providing a centralized and standardized method of processing the information within the system. |
| 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 | |



| 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.)? | <p>Retrieved thru online query, web server, and batch.</p> <p>Yes, it can be identified by personal identifier – TIN, Warehouse Number, Producer ID, and Name</p> |
| 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 .) | USDA/FSA-2, Farm Records File (Automated) and USDA/FSA-14, Applicant/Borrower. |
| 30.3 | If the system is being modified, will the SOR require amendment or revision? | <p>Yes</p> <p>No</p> |



4 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? | |



5 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

Electronic Distribution of Disbursement Data (ED3)
(System Name)

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.

Rosemary Hall, Information System Owner

Date

John Underwood, Chief Privacy Officer

Date

James Gwinn, FSA CIO

Date

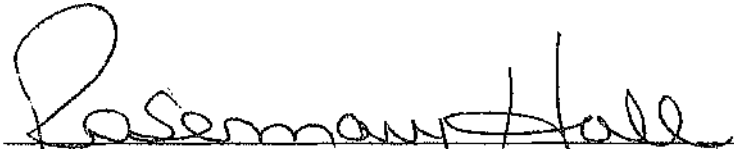
Privacy Impact Assessment talthcrtion Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Electronic Distribution of Disbursement Data (ED3)
(System Name)

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




Rosemary Hall, Information Syst_{er}

4/13/10
Date



John Underwood, Chief Privacy Officer

4/13/10
Date



James G , FSA CIO

4/28/2010
Date