



**Privacy Impact Assessment
(PIA)
Tobacco Transition Payment Program
(TTPP)**

Revision: 1.1



Farm Service Agency

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Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.0	2/17/2010	Judy Sobbing, ECS	Initial 2010 Document
1.1	02/17/2010	Jack W. Meis, PSCAO/SFG	Initial review and update
1.2	2/23/2010	Judy Sobbing, ECS	Per John Underwood recommendations updated question 2,1, 3, 4, 4.1, 4.2, 4.3, 6, 8, 9, 9.1, 10, 21.1, 23, 28,and 30.3,



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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 **Tobacco Transition Payment Program (TTPP)** 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:	Tobacco Transition Payment Program (TTPP)
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	The Tobacco Transition Payment Program (TTPP) is mandated by Public Law # 108-357, the American Jobs Creation Act of 2004, signed by the President on October 22, 2004. Under this legislation, between 9.6 and 10.14 billion dollars worth of payments are to be made to more than 670,000 tobacco quota holders and producers. This will be a 10 year program, with the last of the payments being made in 2014.
Who owns this system? (Name, agency, contact information)	C. Michael Boyles U.S. Department of Agriculture Farm Service Agency Beacon Building (816) 926-1905 mike.boyles@kcc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	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
Who completed this document? (Name, agency, contact information)	Jack W. Meis Farm Service Agency ISTD/ADC/PSCAO/SFG (816) 823-1809 jack.meis@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: The customer will receive a contract and a confirmation form with the number of pounds to be paid and the dollar amount per pound. Employee: The employee will use farm data and base quota level data to create the contract for the customer.
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.	Executive Order 9397, the Commodity Credit Corporation Charter Act (15 U.S .C. 714 et seq.) and the Fair and Equitable Tobacco Reform Act of 2004 (P.L. 108-357)
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.	Ye s No
4	Sources of the data in the system.	USDA/FSA only; The data to load the SQL data base came from the upload of the county files (CAD/NASS tapes). The requirements in the User Requirements were applied before the database was loaded.
4.1	What data is being collected from the customer?	Taxpayer ID, Taxpayer ID Type, Farm Number, Tract Number, and Base Quota Level.
4.2	What USDA agencies are providing data for use in the system?	Farm Service Agency
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?	Copies of Land deeds, estate documents and other agreements will be collected and filed as paper copies.



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?	Land deeds and other agreements will be checked by the county tax office, etc. Data will be verified against S/36 reports and queries.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Land deeds and other agreements will be checked by the county tax office, etc. Data will be verified against S/36 reports and queries.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Land deeds and other agreements will be checked by the county tax office, etc. Data will be verified against S/36 reports and queries.

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 data will be used to allow the program to provide annual transitional payments to eligible tobacco quota holders and producers.
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



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?	Cross checks to S/36 reports and hardcopy records.
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 data will be used to allow the program to provide annual transitional payments to eligible tobacco quota holders and producers.
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?	Both eAuth and EAS for authentication and role-based authorization
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?	Changing passwords, new passwords, call back features of routers to associations, password verifications, system monitoring

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?	At least fifteen years.
14.2	What are the procedures for purging the data at the end of the retention period?	Standard procedures are used, as documented in various handbooks, such as the FSA 25-AS



No.	Question	Response
14.3	Where are these procedures documented?	Standard procedures are used, as documented in various handbooks, such as the FSA 25-AS
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?	There are checks and balances in the system for any one farm's records. Third party reviews were completed on all contracts in the county offices before any were paid.
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?	
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?	Yes.
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?	The software and the database are centrally located; accessible via the web. Notices will be used to inform the counties of proper usage.

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.)?	County Office Users, System Administrators, Managers, Application Support representatives, developers



No.	Question	Response
21	How will user access to the data be determined?	By using FSA’s standard security with logins verified through eAuth and EAS.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes s No
22	How will user access to the data be restricted?	Access is restricted based on county. Must have administrator rights to change passwords, etc. Application Support, State and National users will have read only access to reports.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes s
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.)?	Production Adjustment and Risk Management Office and USDA Privacy Office.
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 6501 Beacon Drive Kansas City, Missouri 64133 Phone: 816-926-6992 Cell: 816-564-8938 Fax: 816-448-5833 mailto:john.underwood@kcc.usda.gov



No.	Question	Response
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.	
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)?	Yes No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	By utilizing a standardized, non-individual based method of calculating and then making annual transitional payments to eligible tobacco quota holders and producers.
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	



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 user must login with ID and password to access data. Yes, data can be displayed and/or modified by farm serial number, tax payer id or contract 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 www.access.GPO.gov .)	USDA/FSA-2, Farm Records File (Automated)
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes .



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

Tobacco Transition Payment Program
(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.

C. Michael Boyles, System Owner

Date

John Underwood, Chief Privacy Officer

Date

James Gwinn, FSA CIO

Date



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February 18, 2010

C. Michael Boyles, System Owner

Date

February 19, 2010

John Underwood, Chief Privacy Officer

Date

3/2/2010

James Gwinn, FSA CIO

Date