USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: USDA Rural Development

System Name: Enterprise Content Management (ECM)

System Type: ☒ **Major Application**
☐ **General Support System**
☐ **Non-major Application**

System Categorization (per FIPS 199):   ☐ **High**
☒ **Moderate**
☐ **Low**

Description of the System:

Enterprise Content Management (ECM) is a NITC based mission-critical system with a FIPS 199 security rating of "moderate." ECM receives, collects, imports, interprets, documents and track incoming correspondence and content from public, individual, private, political sources and internal sectors from the beginning of the inquiry up to and including its resolution and response back to the originator.

Enterprise Content Management (ECM) allows USDA to manage business documents, including correspondence, effectively and efficiently.

Features and Benefits

ECM currently includes four functional modules. These modules all use USDA's Enterprise Shared Services hardware and software infrastructure. However, each presents a different user interface that has been customized and fine-tuned to meet a specific set of business requirements. Over the next several years, additional ECM modules will be available to meet other USDA business needs.

Correspondence Management Module

The Correspondence Management Module helps USDA employees at any organizational level manage correspondence and other documents from initial receipt through completion and archival storage. The system's strong workflow capabilities enable documents to be routed within or among USDA agencies and offices for collaborative input or review, and a robust security scheme ensures that information is available only to authorized personnel. Easy-to-use search and report features are helping executives, managers, and other users find and display the information they need quickly and efficiently.

The Correspondence Management Module can:
•   Support and streamline intra-agency and interagency correspondence and document management processes, whether at USDA headquarters or a field office, within a secure environment.

- Offer ease of access to users while, as a Web-based application, eliminating the need to install or support desktop client software.
- Provide a computer-based work environment, eliminating document loss and reducing time required for document review and revision.
- Support a "less paper" environment while improving service.
- Detect and Categorize possible duplicates of correspondence and Campaign Mail through enhanced content analysis.

Content Analysis Module

ECM's powerful, versatile features are also proving useful for specialized non-correspondence applications. USDA agencies and offices, for example, are using the Content Analysis Module (CAM) to view public comments solicited by USDA on the 2007 Farm Bill. CAM users can view the database of comments according to key issues and then "drill down" to access each actual comment.

General Use Module

USDA agencies and offices are utilizing the ECM General Use Module (GUM) to manage administrative processes. For example, Rural Development (RD) uses GUM to track payments and tenant certifications, maintain a running case record for their accounts, and for general tasking of employees. GUM allows management to track documents, record actions taken, and utilize archival storage.
The Office of the Chief Information Officer (OCIO) uses GUM to manage requests for information technology waivers and similar documents at all stages, from initial application through final decision and archival storage. Applicants and OCIO managers can track the status of these items at all stages of the business process.

Invoice Processing Module

USDA agencies and offices are utilizing the ECM Invoice Processing Module to store all USDA invoices in a centralized repository. Currently, managers use the module to manage the approval and payment processing of invoices. Future phases will follow the invoices through all stages of the business process from initial submission through final decision and archival storage. Vendors will be able to electronically submit their invoices and check on the status of those invoices.

COD Telephone/Utility Module

An ECM module will be implemented to process USDA telephone and utility invoices. Currently, National Finance Center (NFC) employees use the module to manage the approval and payment processing of telephone and utility bills. Future phases will follow the invoices through all stages of the business process and may include a flat file transmission of data to a NFC application.

Acquisition Management Module

The Forest Service uses AMM to manage and document approval of acquisition requests for their procurement staff. Acquisition requests are tracked at all stages, from

initial application through final decision and archival storage.   Procurement managers can track the status of these items at all stages of the business process.

Security

There are several layers of security built into ECM starting with access to the application and moving into each module, agency, group and user.

The application also allows folder and even document security to be customized.

New Folders

Folders can be created by:

- Incoming scanned and faxed documents that are routed to a folder set up group where data fields are populated and workflow tasks can be initiated;

- Manually by a user to store documents, track a request, initiate a work task, disseminate information, or for any other reason imaginable.

Data fields are populated and modified as needed by authorized users, tasks are documented and completed, and documents and responses are collected and recorded.

Workflow Inbox

Upon entering the Workflow Inbox, the user sees all personal tasks to be completed and all group tasks that are not yet started.

The Inbox can be sorted and displayed using any combination of the dropdown boxes.

Overdue tasks are 'Red'; tasks that are currently due or not yet due are 'Black'.

When the user selects a task to be worked, the folder is opened and the information and documents can be viewed.

Upon completion of the task, the next task is assigned and the assignee is notified via preferences set in the user's Personal Profile.

Notes Tab

Notes can be added by anyone with folder access. They are used to provide any type of information that the user deems relevant to the folder, documents, or actions.

The Notes feature places a date and time (CST) stamp on each note with the most recent note at the top.

Once added, a note can not be modified or removed.

Powerful Search Engine

ECM provides a powerful search capability.

A user can search for a folder or documents using any field or combination of fields on the 'Find Folders and Documents' screen.

A 'Content Search' allows the user to find documents by a specific word or phrase.

The results can be displayed as folders or documents.

While the list contains all folders/documents that meet the search criteria, ECM's Security feature will only grant access to authorized users

Document Templates

ECM provides a Document Template Library. Users store documents that are commonly used making them readily available for all users.

Each template has a limited shelf life that is determined by the author when the template is added. The user is notified via e-mail when the template expires. It can then be reviewed and modified or deleted if needed.

Customized List of Values

In the ECM application, several folder fields have lists of valid values that can be selected by the Folder Owner. These valid values can be customized for specific groups.

The lists of values that can currently be customized are:
- Subjects
- Document Types
- Task Descriptions

An administrator then has the advantage of setting and limiting lists to those values that are unique to their organization's mission.

Special Features

Word Add-In allows the user to check in document or save a draft directly to ECM

A Spell Check function is available in several text boxes by clicking the 'ABC' button.

Quick Print:
Checking the Quick Print Box
defaults to the User's Personal
Profile to create customized reports automatically.

E-mail Integration: A useful and timesaving tool that is available through ECM is the ability to add the body of an e-mail and/or attachment to an e-mail directly to a folder.

AgLearn Courses: An interactive resource that allows users to learn ECM functions on their own schedule and at their own pace;

Dedicated FAX Line Integration: Automatically import faxes into folders

Who owns this system?
Kathy Anderson
Chief, Enterprise Technologies and Services
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4300 Goodfellow Boulevard
St. Louis, MO
kathy.anderson@stl.usda.gov
(314) 457-5012

Who is the security contact for this system?

Eugene Texter
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4300 Goodfellow Boulevard
St. Louis, MO   63120
eugene.texter@stl.usda.gov
314-457-4778

Brenda Dinges
USDA Rural Development
4300 Goodfellow Boulevard
St. Louis, MO   63120
brenda.dinges@stl.usda.gov
314-457-4772

Who completed this document?

Edward Koenen
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USDA Rural Development
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DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?

QUESTION 1 Does the system contain any of the following type of data as it relates to individual:	Citizens	Employees

Name	**Yes**	**No**
Social Security Number	**Yes**	**No**
Telephone Number	**Yes**	**No**
Email address	**Yes**	**No**
Street address	**Yes**	**No**
Financial data (i.e. account numbers, tax ids, etc)	**Yes**	**No**
Health data	**No**	**No**
Biometric data	**No**	**No**
QUESTION 2 Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.? NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code[1]	**Yes**	**No**
Are social security numbers embedded in any field?	**Yes**	**No**
Is any portion of a social security numbers used?	**Yes**	**No**
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	**Yes**	**No**

If all of the answers in Questions 1 and 2 are NO,
You do not need to complete a Privacy Impact Assessment for this system and the answer to
OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets,
Part 7, Section E, Question 8c is:
3. No, because the system does not contain, process, or transmit personal identifying information.

If any answer in Questions 1 and 2 is YES, provide complete answers to all questions below.

DATA COLLECTION

3. Generally describe the data to be used in the system.

   Correspondence Management Module: ECMM receives and tracks correspondence inquires and content from the public, private, political, and internal sectors from the beginning of the inquiry up to and including its resolution and response back to the originator.

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[1] Comments of Latanya Sweeney, Ph.D., Director, Laboratory for International Data Privacy Assistant Professor of Computer Science and of Public Policy Carnegie Mellon University To the Department of Health and Human Services On "Standards of Privacy of Individually Identifiable Health Information". 26 April 2002.

General Use Module: The General Use Module is used by many different Agencies for a content searchable document repository, general tasking or assigning of work and many combinations of both.

Invoice Processing Module: Invoices received by the Department are scanned into this module and processed. If approved, they are sent to the IAS and FFIS system for payment.

Controller Operations Division (COD) Telephone and Utility Invoice Processing: This module is designed specifically for the processing of telephone and utility bills. Bills are scanned in, processed and stored in ECM.

Acquisition Management Module: Is used to store Departmental Acquisition documentation and route work to employees.

4. Is the collection of the data both relevant and necessary to the purpose for which the system is designed? In other words, the data is absolutely needed and has significant and bearing on the system's purpose.

☒ Yes
☐ No. If NO, go to question 5

4.1. Explain.

The data attributes provide status of the inquiries and USDA staff responses to correspondence.

The data attributes provide status of invoices.

The data attributes provide status and description of documents stored in the application.

5. Sources of the data in the system.

5.1. What data is being collected from citizens and/or employees?

Privacy Act protected information to include (but not limited to): SSN, Taxpayer Identification (ID) Numbers, debt payment information, addresses, etc.

5.2. What USDA agencies are providing data for use in the system?

All USDA agencies.

What government agencies (state, county, city, local, etc.) are providing data for use in the system?

No state or local agencies provide data.

5.3. From what other third party is data being collected?

The only third party data will be the originating inquiry from the public, private or political sectors.

6. Will data be collected from sources outside your agency? For example, citizens and employees, USDA sources (i.e. NFC, RD, etc.) or Non-USDA sources.

☒ Yes
☐ No. If NO, go to question 7

6.1. How will the data collected from citizens and employees be verified for accuracy, relevance, timeliness, and completeness?

The inquiry and correspondence tracking system will provide constant updates and review of applicable data by USDA personnel. Data sources from outside the USDA are incoming correspondence, invoices and other miscellaneous documents to the agencies. These documents are retained in their original form.

6.2. How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?

See 6.1

6.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?

See 6.1

DATA USE

7. 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 receive and track correspondence inquires and content from the public, private, political, and internal sectors from the beginning of the inquiry up to and including its resolution and response back to the originator.

To process the payment of invoices sent to the USDA.

8. Will the data be used for any other purpose?

☐ Yes
☒ No. If NO, go to question 9

8.1. What are the other purposes?

N/A

9. Is the use of the data both relevant and necessary to the purpose for which the system is being used? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose.

☒ Yes
☐ No. If NO, go to question 10

9.1. Explain.

The data attributes provide status of the inquiries and USDA staff responses.

The data is used to justify the payment of invoices.

10. 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 11

10.1.   Will the new data be placed in the individual's record (citizen or employee)?

☐ Yes
☒ No

10.2.   Can the system make determinations about citizens or employees that would not be possible without the new data?

☐ Yes
☒ No

10.3.   How will the new data be verified for relevance and accuracy?

N/A

11. Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended <u>routine</u> uses of the data being collected?

The inquiries begin with an input (probably printed letter format) which is directed to a USDA Agency. The inquiry is then sent electronically throughout the appropriate USDA Agency until resolution is determined and a response is sent back to the originator of the inquiry.

Invoice processing begins with an input (usually printed invoice format) which is directed to a USDA Agency.   The Agency fills out an IAS 1 form which is attached to the invoice and faxed/scanned into ECM to approve the payment of the invoice. The National Finance Center then reviews the IAS 1 Form and processes the payment of the invoice.

12. Will the data be used for any other purpose (other than indicated in question 11)?

☒ Yes

☐ No. If NO, go to question 13

12.1.   What are the other purposes?

The system takes a printed letter inquiry and digitizes it by use of a scanner. The scanned inquiry is then sent to the appropriate offices and tracked for location and response status. Supporting documents and responses are added to each inquiry's folder.

When an invoice is not approved for payment, Agencies are provided with a report that lists the canceled invoices for their Agency. This affords them the opportunity to review the cancelled invoice and provide any necessary documentation to allow NFC to approve the payment. It also provides a document repository to allow USDA employees to review previous invoices sent for payment.

13. 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 14

13.1.   What controls are in place to protect the data and prevent unauthorized access?
N/A

14. Are processes being consolidated?

☐ Yes
☒ No. If NO, go to question 15

14.1.   What controls are in place to protect the data and prevent unauthorized access?
N/A

DATA RETENTION

15. Is the data periodically purged from the system?

☐ Yes
☒ No

15.1.   How long is the data retained whether it is on paper, electronically, in the system or in a backup?

Electronic Documents are currently retained permanently. We have been charged with implementing a records manager product but that software and the custom configuration has not been implemented at this time.

The Centralized Servicing Center keeps scans many documents into ECM for CSC and for other USDA ECM user groups. CSC has negotiated a retention period for hard copies. This retention period varies by customer and is contained in written contracts maintained in CSC.

15.2. What are the procedures for purging the data at the end of the retention period?

N/A Data is retained permanently

15.3. Where are these procedures documented?

N/A Data is retained permanently

16. 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 currently retained permanently.

17. Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

⊠ Yes
☐ No

DATA SHARING

18. 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 19

18.1. How will the data be used by the other agency?
N/A

18.2. Who is responsible for assuring the other agency properly uses of the data?
N/A

19. Is the data transmitted to another agency or an independent site?

⊠ Yes
☐ No

19.1. Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?
Yes, ISA (Interagency Service Agreement) for IAS (Integrated Acquisition System)

19.2. Where are those documents located?
Kathy Anderson
Chief, Enterprise Technologies and Services

20. Is the system operated in more than one site?

☐ Yes
☒ No. If NO, go to question 20

20.1. How will consistent use of the system and data be maintained in all sites?
N/A

DATA ACCESS

21. Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?

ECM system users and managers and ECM Systems Administrators.

21.1. Are criteria, procedures, controls, and responsibilities regarding user access documented?

☒ Yes
☐ No. If NO, go to question 23

21.2. Where are criteria, procedures, controls, and responsibilities regarding user access documented?

The criteria of information are located in the ECM System Security Plan, Security Features User Guide, Trusted Facility Manual, and Risk Assessment documents.

22. How will user access to the data be restricted?

ECM access is controlled by eAuth and roles determined by the application administrators. In order to access ECM a user must be attempting to log in from a USDA computer, have a level 2 eAuth account and have been granted access to ECM. Once inside ECM users, managers and administrators only have access to the documents they are allowed to view and edit. ECM's robust security allows folder and document owners to restrict access to folders and documents inside folders.

22.1. Are procedures in place to detect or deter browsing??

☒ Yes
☐ No

22.2. Are procedures in place to detect or deter 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

CUSTOMER PROTECTION

24. Who will be responsible for protecting the privacy rights of the citizens and employees affected by the interface (i.e. office, person, departmental position, etc.)?

Kathy Anderson
Project Manager
4300 Goodfellow Blvd.
St. Louis, Missouri 63120
Phone Number: 314-457-5012

25. How can citizens and employees contact the office or person responsible for protecting their privacy rights?

Citizens and employees may contact the Freedom of Information Officer:

Dorothy Hinden
Freedom of Information Officer
Rural Development, USDA
7th Floor, Reporter's Bldg.
Washington, DC 20250
Dorothy.Hinden@wdc.usda.gov
(202)692-0031

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, where is the breach notification policy located?

- U.S. Department of Agriculture Incident Notification Plan September 2007

- DM3505-001 USDA Computer Incident Response Procedures Manual.

- Computer Incident Response Standard Operating Procedures (CIRT)

☐ No - If NO, please enter the POAM number with the estimated completion date:

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 citizens and employees of fundamental rules of fairness (those protections found in the Bill of Rights)?

☐ Yes
☒ No. If NO, go to question 29

27.1.   Explain how this will be mitigated?
N/A

28. How will the system and its use ensure equitable treatment of citizens and employees?

DM 3515-002, section e states:

To fulfill the commitment of the USDA to protect customer and employee data, several issues must be addressed with respect to privacy:
1 The use of information must be controlled; and
2 Information may be used only for a necessary and lawful purpose.

Where PA systems of records are involved:
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, and complete to assure fair treatment of the individual.

Also, P.L. 95-454, the Civil Service Reform Act of 1978 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 citizens and employees differently and unfairly based upon their individual or group characteristics?

☐ Yes
☒ No. If NO, go to question 31

29.1.   Explain
N/A

SYSTEM OF RECORD

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

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 can be retrieved using the content search features in ECM. Any word on any document can be searched on and produce a results list. However, a user must have access to that folder to obtain the information.

30.2.   Under which Systems of Record notice (SOR) does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov)

http://www.ocio.usda.gov/OES-1_USDA_Enterprise_Content_Management%20.txt

30.3.   If the system is being modified, will the SOR require amendment or revision?

NO

TECHNOLOGY

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 citizens and employees privacy?
N/A

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
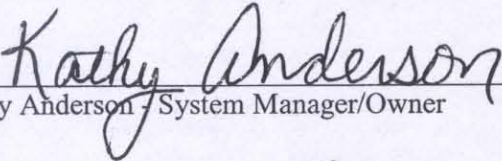THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY

Privacy Impact Assessment Authorization
Memorandum

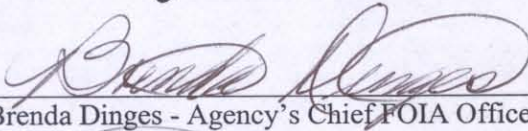I have carefully assessed the Privacy Impact Assessment for the ECM System

This document has been completed in accordance with the requirements of the EGovernment 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.
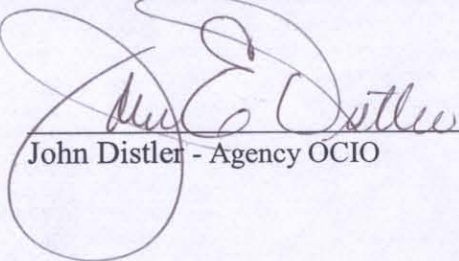
_____   ___4/8/08___
Kathy Anderson / System Manager/Owner   Date

_____   ___4/16/08___
Brenda Dinges - Agency's Chief FOIA Officer   Date

_____   ___4/10/08___
John Distler - Agency OCIO   Date