



UNITED STATES DEPARTMENT OF
AGRICULTURE

FARM SERVICE AGENCY

Privacy Impact Analysis (PIA)
for
**Consolidated Financial Management
Information Systems
(CFMIS)**

- Debt Systems
- Payment Systems
- Centralized Disbursement Systems (CDS)
- Financial Services Systems (FSAFS)
- National Payment Services (NPS)
- Core Systems
- Cash Systems
- Financial Management System (FMS)

FINAL

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ADC/AFAO
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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 Consolidated Financial Management Information Systems (CFMIS) 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 Applicability

2.1 Applicability of System

The information in this document is applicable to the system and its subsystems as listed below.

Table 1: System Applicability

System	Subsystem
Consolidated Financial Management Information Systems (CFMIS)	<ul style="list-style-type: none"> • DEBT SYSTEMS <ul style="list-style-type: none"> ○ Common Receivable System (CRS) ○ Automated Claims System (ACS) ○ Debt Data Warehouse (DDW) ○ Automated Collection Application System (ACAS) ○ Central Claims Data Base System (CCDB) ○ Debt Imaging (Filenet) <ul style="list-style-type: none"> ▪ Producer Claims Imaging ▪ Department of Justice Imaging ▪ ACH Return ▪ Document Wizard Web Retrieval • PAYMENT SYSTEMS <ul style="list-style-type: none"> ○ Assignment/Joint Payment System (AJPS) ○ Check Writing System (CWS) ○ Data Control System (DCS) ○ Direct Deposit System (DDS) ○ Check Accounting System (CAS) ○ Payment Control System (PCS) ○ Electronic Funds Control (EFC)

System	Subsystem
	<ul style="list-style-type: none"> • Centralized Disbursement System (CDS) • Financial Services System (FSAFS) • National Payment Services (NPS) <ul style="list-style-type: none"> ○ On-line Payments • CORE General Ledger System <ul style="list-style-type: none"> ○ CORE-DW-CORE Data Warehouse ○ CCC CORE-CCC CORE Mainframe ○ FSA CORE-FSA CCC CORE Mainframe • CASH SYSTEMS <ul style="list-style-type: none"> ○ Cash Receipts System (CASH) ○ Concentration Banking System (CBS) ○ Interactive Voice Response System (CBSIVR-CBS) ○ Financial & Accounting Info Reporting System (FAIRS) • Financial Management System (FMS) <ul style="list-style-type: none"> ○ FMS-Financial Management System-Mainframe ○ FMRS-Financial Management Reporting System DW

2.2 System Overview

2.2.1 Debt

Debt Systems is comprised of several subsystems or modules.

- Debt Data Warehouse (DDW) keeps all Debt information (claims and receivables) as a data warehouse. It is used for reporting purposes.
- Common Receivable System (CRS) tracks all receivables that were generated at the county level. When the receivable becomes 60 days old without being paid, CRS send that receivable to ACS as a claim. CRS also sends data about the receivable to DDW via the bundle control system.
- Automated Collection Application System (ACAS) tracks debt claims for the government against debtors. This system sends the debt information to Dept. of the Treasury for Government Payment Off-Set processing.
- Central Claims Data Base (CCDB) consolidates all claims from the various county offices. After editing all transactions and processing the valid transactions, the valid transactions are passed on to the Debt Data Warehouse and CORE Accounting System. Existing claims are uploaded to ACAS nightly.
- Automated Claims System (ACS) tracks all claims that are established at the county level. It generates and track the issuance of Demand letters, payments received, referral information

and all other processes involve in the management of the claim. The ACS transactions are sent to the CCDB via the bundle control system.

- Producer Claims Imaging - IMAGING is a file net imaging system allows the input of documents for storage and retrieval. All data is user input from document storage, fax, and scanned materials. Controls work flow associated with documents.

2.2.2 Payment

Payment System's overall mission involves the disbursement of funds to farmers, vendors, service center offices operating expenses. The system tracks what payments are to be made and to whom, the check writing system then disburses that money to the appropriate party.

The Payment System is comprised of several Subsystems or modules.

- Assignments/Joint Payments (AJPS) collects information on third-party assignees designated by producers to receive all or part of their payments directly from FSA programs.
- Check Writing System (CWS) issues payments by check for various FSA programs.
- Data Control System (DCS) purpose is to collect and provide information for other payment systems such as Assignments and Joint Payments (AJPS), Check Writing System (CWS), Direct Deposit System (DDS), and Electronic Funds Control (EFC).
- Direct Deposit System (DDS) purpose is to collect information necessary to perform direct deposit transactions for various Farm Service Agency (FSA) programs.
- Payment Control System (PCS) is a reconciliation tool used by accountants and is used to balance the general ledger accounts pertaining to direct deposit (ACH - Automated Clearing House) payments made by FSA and NPS check payments disbursed through Treasury.
- Centralized Disbursement System (CDS) allows miscellaneous payments to be made online by users via CCC-374 checks or Automated Clearinghouse payments. The system also allows other systems to feed and process payments through CDS via an automated interface procedure.
- Electronic Funds Control (EFC) purpose is to process electronic transactions for various Farm Service Agency (FSA) programs. EFC does not process or store any privacy information.
- Check Accounting System (CAS) is a check reconciliation system that carries out two transactions:
 - Issue- a county issuing a check to someone
 - Pay- Federal Reserve sends info on the payment of the check.

When these two do not equal 0, there is an exception. The mission of CAS is to help the internal employees reconcile the exceptions.

2.2.3 Centralized Disbursement Systems (CDS)

The Centralized Disbursement System (CDS) is an interactive COBOL/ADSO oriented information management system. CDS accepts payment data from any Kansas City Commodity Office (KCCO), Kansas City Finance Office (KCFO), or St. Louis Farm Loan mainframe system that generates a payable record. CDS also accepts the manual input of payable invoices and Excel spreadsheets assuming the disbursement function of both automated and manual processes. CDS allows miscellaneous payments to be made online by users via CCC-184 checks or ACH. CDS also allows other systems to feed and process payments through CDS via an automated interface procedure to pay as ACH or as Treasury Checks. CDS receives and processes data needed to produce disbursements by check and Automated Clearinghouse (ACH) direct deposits. The ACH payment files are sent electronically to the Minneapolis Federal Reserve Bank (MNFRB). The Treasury Check files are sent electronically to the Kansas City branch of the Treasury Department.

In addition, CDS generates confirmation files and interfaces where needed and various disbursement data output files which are sent to other systems such as the Check Accounting System (CAS), Payment Control System (PCS), Electronic Disbursement Data (ED3), Payment Data Mart, Producer Payment Reporting System (PPRS), National Payment Service (NPS) and OEO-FAADS Reporting System. It generates and interface financial accounting data to the CORE Accounting System.

This system resides on the NITC mainframe and uses an Integrated Database Management System (IDMS) and is administrated by the Kansas City Commodity Office (KCCO).

2.2.4 Financial Services Systems (FSAFS)

FSA Financial Services is an application that will enable customers and service center employees to enter and maintain direct deposit, assignment and joint payment information for FSA customers.

FSA Financial Services will perform the following functions:

- Validate information entered for single year or multi year assignments
- Validate direct deposit banking information entered for producers and facilities
- Validate joint payment information entered for producers and facilities

2.2.5 National Payment Services (NPS)

National Payment Service is an application that will verify and facilitate completion of payment requests from FSA payment applications.

NPS will perform the following functions:

- Validate that a payment request contains essential FSA accounting information
- Verify that sufficient funds are available for the program payment requested
- Provide opportunity for Service Center employees to 'offset' program payment against any known outstanding government debt
- Provide opportunity for Service Center employees to certify and sign payment
- Determine if disbursement is to be made by check or direct deposit (obtain appropriate bank routing information)
- Determine and apply assignment/joint payee information

The Online Payments application is a new service under the Administrative and Financial Applications Office (AFAO).

Online Payments is developed in support of the effort to migrate Farm Service Agency (FSA) processing away from the System 36/SSP environment at the Service Centers. This new service will allow service centers to submit payment and overpayment requests for non-automated programs to the National Payment Service.

Online Payments performs verification of requests prior to sending to NPS. If the payment or overpayment request is rejected by NPS, then further processing of the request does not occur, and a payment or overpayment does not actually take place.

Online Payments is accessed by Service Center Office (SCO) staff, primarily in the county offices with some activity at state level. Other users could include Financial Management (FMD), Budget (BUD) and Kansas City Finance Office.

The Online Payments application resides on the Web Farm located at NITC, 8930 Ward Parkway in Kansas City, MO.

2.2.6 Core

The FSA/CCC CORE is a general ledger COTS package implemented by the FSA to provide a single system for FSA Appropriated Budgetary and Financial Accounting System referred to as ABAFAS and the Legacy General Ledger System referred to as Financial Management System. The FSA/CCC CORE and CORE Data Warehouse system consists of three components:

- CORE-DW-CORE Data Warehouse
- CCC CORE-CCC CORE Mainframe
- FSA CORE-FSA CCC CORE Mainframe

The FSA/CCC CORE system utilizes data from several other accounting applications as well as provides data to applications. Data from the FSA/CCC CORE is used by several areas including those in Washington, D.C., Congress, for budgeting and reporting purposes.

2.2.7 Cash

The CASH System effectively manages all steps involved with the cash receipts process made to the FSA by producers. The systems comprising the CASH System collectively handle the tracking, processing, collection, and reporting of cash receipts made to the FSA. The CASH System is a vital tool for the managing, borrowing and repayment process to the Treasury. The system utilizes the functionality of several sub-systems and provides a unified and central location for all cash receipt information for the FSA. The sub-systems include:

- Cash Receipts System (CASH) AS400 , MF
- Concentration Banking System AS400 (CBS), MF
- Interactive Voice Response System (CBSIVR-CBS)
- Financial & Accounting Info Reporting System (FAIRS)

2.2.8 Financial Management Systems (FMS)

The FSA Financial Services application will provide the user the ability to create, edit and update Assignments, Joint payments and Direct deposits for FSA customers/producers. FSA-FS replicates Assignment, Joint Payments and Direct Deposit profiles down to the applicable service center (AS/400 & System 36) when appropriate for processing distributed programs.

FSA-FS is to be an intranet-based application functional at the FSA National level, FSA State Office level, and FSA Service Center level as indicated in this document. It will also be an internet- base application that is available to the public for USDA customers to use.

USDA PRIVACY IMPACT ASSESSMENT

Table 2: Data in the System

DATA IN THE SYSTEM	
<p>1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.</p>	<p>Customer:</p> <ul style="list-style-type: none"> • Name • Address • TIN/SSN • banking information • delinquent debt and debtor information • information about the payment(s) made to the farmer/producer • SCIMS Core ID • program code and Treasury Referral Status based on TIN <p>Employee: E_Auth user ID</p> <p>Other:</p> <ul style="list-style-type: none"> • Detail program data is maintained at the State and County Office • FMS SCOAP data passes summarized schedule data to the CASH Receipts System The system is designed to confirm and record deposits, and build required CASH reports.
<p>2a. What are the sources of the information in the system?</p>	<p>Debt Systems</p> <ul style="list-style-type: none"> • customer provided information • AE7 File from the SCOAP transmission file • Central Claims Database • Automated Collection Application System • ACAS Notes • CORE Financial System. • System 36 – Automated Claims System at the field offices • Common Receivable System • Service Center Information Management System (SCIMS) <p>Payment Systems</p> <ul style="list-style-type: none"> • Name & Address File • Accounting Transaction Table. • SCOAP • CDS, GIMS, PCIMS, Federal Reserve Bank, Treasury • DD <p>CDS</p>

DATA IN THE SYSTEM	
	<ul style="list-style-type: none"> • Manual inputs at Kansas City offices • County inputs passed to CDS by National Payments System (NPS) <p>FSAFS</p> <ul style="list-style-type: none"> • FS DB2 Database (MQCPD) • Service Center Information Management System (SCIMS) • Name and Address Database • Employee/Customer data entry <p>NPS</p> <ul style="list-style-type: none"> • Master Resource Table (MRT) • Service Center Information Management System (SCIMS) • Financial Accounting Systems (CORE) • Electronic Funds Control (EFC) • DEBT Data Warehouse • Automated Claim Collection Accounting System (ACAS) • Financial Services (FS) <p>Core Systems</p> <ul style="list-style-type: none"> • Manual inputs at Washington, DC and Kansas City offices • County inputs provided through Bundle Control System (BCS) <p>Cash Systems</p> <ul style="list-style-type: none"> • Daily bank deposits received from each financial institution (U.S. Bank and Riggs National Bank). • The CASH Receipts System process CADE and electronically transmitted data and online data entry. • The CASH Receipts data received from Federal Reserve Bank and Concentration Bank <p>Financial Management System (FMS)</p> <ul style="list-style-type: none"> • Manual input from County via System 36 and it is transmitted to the AS400 Comm Machines. • NPS data is merged with county office Transmissions and are input to FMS
2b. What USDA files and databases are used? What is the source agency?	<p>Debt Systems</p> <ul style="list-style-type: none"> • Common Receivable System

DATA IN THE SYSTEM

- Service Center Information Management System (SCIMS)

Payment Systems

- DB2 database (MGWPD), FSA

CDS

- USDA Automated Clearing House (ACH) payment files and Integrated Database Management System

Source agency: FSA.

FSAFS

- FS DB2 Database (MQCPD)
- Service Center Information Management System (SCIMS)
- Mainframe "Other" Name and Address Database
- Employee/Customer data entry

Source agency: FSA.

NPS

- Master Resource Table (MRT)
- Service Center Information Management System (SCIMS)
- Financial Accounting Systems (CORE)
- Electronic Funds Control (EFC)
- DEBT Data Warehouse
- Automated Claim Collection Accounting System (ACAS)
- Financial Services (FS)

Source agency for all above is FSA.

Core Systems

- Financial Management System-State & County Office Automation Project (FMS-SCOAP)
Farm Storage Facility Loans (FSFL)
- Check Accounting (CAS)
- Financing & Accounting Information Reporting System (FAIRS)
- Conservation (Obligations)

DATA IN THE SYSTEM

- Automated Cotton Reporting System (ACRS)
- Centralized Disbursement System (CDS)
- Grain Inventory Management System (GIMS)
- Processed Commodity Inventory Management System (PCIMS)
- Cotton Online Processing System (COPS)
- County Office Expense (COE)
- DB2: Core
- Informix: Core Warehouse

Source agency for all above is FSA.

Cash Systems

- Riggs National Bank -
MFO900.MHR310C2.DATA
MFO901.MHR310C2.DATA(+1)
- U S Bank (Lockbox File) -
MFO900.MHR310M1.DATA
MFO901.MHR310M1.DATA(+1)
- Financial Management System (FMS)
State and County Office Automation Project
(SCOAP) file
MFO901.MSQ51503.DATA Tape C
- Federal Reserve Bank
CADE Data File – MFO901.MHR100C2.DATA
- Database – IDMS
MSPGSS915.GSM.DBA.LOAD
MSPGS915.GSM.LOAD
MSPGS915.CASH.DATA

Source agency: FSA

Financial Management System

- Check Accounting (CAS)
- Financing & Accounting Information Reporting System (FAIRS)
- Grain Inventory Management System (GIMS)
- FSA-CORE
- NRCS
- CCDB
- PCS
- PPRS

DATA IN THE SYSTEM	
2c. What Federal Agencies are providing data for use in the system?	<p>Federal Agency Sources:</p> <ul style="list-style-type: none"> • AMS • FNS • Kansas City Commodity Office • Farm Service Agency • Department of Justice • Treasury • Minneapolis Federal Reserve Bank
2d. What State and Local Agencies are providing data for use in the system?	FSA State and County offices
2e. From what other third party sources will data be collected?	<ul style="list-style-type: none"> • Cotton Cooperatives • Peanut Marketing Association • Riggs National Bank • U S Bank (Lockbox File) • Federal Reserve Bank • CADE Data File • Farmers/Producers
2f. What information will be collected from the customer/employee?	<ul style="list-style-type: none"> • Name • Address • SSN • TIN
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	<ul style="list-style-type: none"> • Standard Accounting Practice Balance • BCS has Interface stats reports and balancing controls • Systems Accountants review the data for accuracy and completeness prior to inputting the data into the system.
3b. How will data be checked for completeness?	<p>Mixture of human and automated review:</p> <ul style="list-style-type: none"> • System edit validations • Daily balancing comparing General Ledger activity and PCS activity. • Each payment must contain minimal FSA accounting information or the payment will be rejected. Service Center employees are responsible for the 'certification' approval and 'signing' approval of each payment request. • Control records on batch interface files. • Validation before entry into CORE. • Validated by monetary amount prior to entry into data warehouse. • Systems Accountants review the data for accuracy and completeness prior to inputting the data into the system.

Table 3: Access to the Data

ACCESS TO THE DATA	
1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	<ul style="list-style-type: none">• Users• Managers• System Administrators• Developers

ACCESS TO THE DATA

2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

Debt Systems

Access is determined by login ID, system security restrictions, and the exercise of physical security controls. Follow 6-IRM for established criteria, procedures and controls.

Payment Systems

Security request/approval documented via FSA-13A

CDS

Access is determined by the IDMS security office.
Yes, documented.

FSAFS

As long as a user has an eAuth id, there are no restrictions in the system. There are certain eRep roles that are barred from logging in to FS.

NPS

Each NPS user is restricted to the viewing of data within their Service Center area of responsibility.

Each FSA NPS user has assigned Service Centers for which they can view data. NPS will present data to a user for viewing only when it is appropriate for that user to view data

Core Systems

Security request/approval documented via FSA-13A

Cash Systems

The users access the database through online interface written in IDMS DC/DB COBOL language.

The criteria procedures, controls, and responsibilities are documented in the Internal Operations Handbook Processing State and County Office CCC Collections 12-SF (KC).

Financial Management System (FMS) Data is segregated by functional responsibility (i.e. cash vs. inventory vs. debt, etc.). FAO maintains the internal application security table.

ACCESS TO THE DATA

3. Will users have access to all data on the system or will the user's access be restricted? Explain.

Debt Systems

Users will have access based on user ID. Most users are restricted to specific data on defined reports. The exceptions are the Debt components that use System/36. The System/36 logins allow users access to all data residing on the system.

Payment Systems

No restrictions to read data. Write capabilities are restricted by User ID.

CDS

User restrictions are set within the Security screen. This can limit the user to inquiry or modification access; and/or to specific screens within CDS. This allows for separation of duties.

FSAFS

A Service Center employee with a valid eAuth account will have access to data for all counties.

NPS

Users are permitted to read data for customers within their assigned Service Center area of responsibility. (Ex: A Service Center employee for Johnson County, Kansas cannot view payment data for customers in Johnson County, Arkansas)

Core Systems

Discretionary Access is managed through role based security restrictions/rules.

Cash Systems

The users have access to all data on the system.

Financial Management System (FMS)

No restrictions to read data. Write capabilities are restricted by User ID. FAO maintains the internal application security table.

ACCESS TO THE DATA	
<p>4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?</p>	<ul style="list-style-type: none"> • File modifications show in audit log • eAuthentication policies and roles setup in the EAS database. • Warning Banner • System access is issued on a need to know only basis • Security awareness training informs users of their responsibilities with regard to safeguarding privacy information.
<p>5a. Do other systems share data or have access to data in this system? If yes, explain.</p>	<p>Debt Systems Yes. Information is passed to Program Applications, Cash Receipts, Public Access Data Mart, National Payment Service (NPS), and SCIMS.</p> <p>Payment Systems No</p> <p>CDS Yes, CDS does have multiple interconnections to various applications that feed and request data at certain prescribed schedules that are vital to their independent missions. Any data transactions with other systems are made through data files controlled and protected by the standard mainframe security and procedures.</p> <p>FSAFS NPS has direct access to the Financial Services database.</p> <p>NPS Other FSA systems have visibility to NPS data through exposed web service methods.</p> <p>Core Systems Yes. EFUNDS, FSFL, FSAFS, NPS, Payment Data Warehouse, Hyperion, Managerial Cost Accounting (MCA)</p> <p>Cash Systems Yes, the Receipts Data Mart Warehouse extracts data from the CASH database. It depends on this application to be able to conduct their business.</p>

ACCESS TO THE DATA	
<p>5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.</p>	<p>The DAA:</p> <p>Dennis Taitano Farm Service Agency Director, Financial Management Division 1400 Independence Avenue SW Washington D.C. 20250 (202)-720-3674 dennis.taitano@wdc.usda.gov</p>
<p>6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?</p>	<p>Debt Systems Yes for ACAS System, Department of Treasury CCDB System, Commercial Credit Bureaus are supplied delinquent debt status via magnetic tape.</p> <p>Payment Systems No</p> <p>CDS Yes, Minneapolis Federal Reserve Bank, US Treasury – Kansas City, and the county and state local offices.</p> <p>FSAFS No</p> <p>NPS No</p> <p>Core Systems Yes</p> <p>Cash Systems Yes</p> <p>Financial Management System (FMS) Yes, Note: Data from 1614 is extracted from FMRS and provided to the FOIA group for disbursement</p>

ACCESS TO THE DATA

6b. How will the data be used by the agency?

Debt Systems

ACAS System - The Department of Treasury will use the information to offset federal payments, wage garnishment and referral to collection agencies
CCDB System – The information is used to report delinquent debt for the purposes of creditworthiness.

Payment Systems

This subsystem does not share data with outside agencies

CDS

Minneapolis Federal Reserve Bank, US Treasury, Kansas City, and the county and state local offices will feed and request data at certain prescribed schedules that are vital to their independent missions.

FSAFS

This subsystem does not share data with outside agencies

NPS

This subsystem does not share data with outside agencies

Core Systems

Eliminations entry for financial statements

Cash Systems

This system perform reconciliation between the payment data received at the state and county level, and the actual deposit amount reports by the Federal Reserve Banks, Concentration Bank, and deposits made via wire transfers.

The system is designed to confirm and record deposits, and build various reports and screens showing the status of the batches and/or schedules.

The CASH Receipts System process CADE and electronically transmitted data and online data entry. The CASH Receipts data received from Federal Reserve Bank and Concentration Bank is balanced to the applicable daily totals. The schedule data is matched to the payment data received from the counties.

This allows for corrections and maintenance to the files for reporting.

Financial Management System (FMS)

FOIA provides member payment data (1614) to requesting organizations for statistical and public reporting.

ACCESS TO THE DATA	
6c. Who is responsible for assuring proper use of the data?	<p>Debt Systems Receiving agency is responsible to follow OMB guidance.</p> <p>Payment Systems This subsystem does not share data with outside agencies</p> <p>CDS Independent agencies; system owners.</p> <p>FSAFS This subsystem does not share data with outside agencies</p> <p>NPS This subsystem does not share data with outside agencies</p> <p>Core Systems Receiving agency is responsible to follow OMB guidance.</p> <p>Cash Systems Application Owner – Financial Operations Division – CASH Management Branch (FOD-CMB)</p> <p>Financial Management System (FMS) FIOA Group</p>

Table 4: Attributes Of the Data

ATTRIBUTES OF THE DATA

ATTRIBUTES OF THE DATA	
<p>1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?</p>	<p>Debt Systems Yes, the data is used to track debts to the federal government.</p> <p>Payment Systems Yes, the data is used to track amounts and scheduling of disbursement of funds to farmers, vendors, and service center offices operating expenses</p> <p>CDS Yes, the data is used to process disbursements.</p> <p>FSAFS Yes, FSAFS provides customer and facility banking information for use in payment processing.</p> <p>NPS Yes, NPS uses the data to complete payment processing.</p> <p>Core Systems Yes, the data is used for general accounting ledger.</p> <p>Cash Systems Yes, the data is used to manage all steps involved with the cash receipts process made to the FSA by producers.</p> <p>Financial Management System (FMS) Yes, the data is used for service center and National Payment Service (NPS) accounting transactions.</p>
<p>2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?</p>	<p>Yes. In processing a payment or payment cancellation, NPS may create new accounting information such as the payoff of debt or creation of new debt. Combining SSN/TIN with address information may provide a means of obtaining credit records.</p>
<p>2b. Will the new data be placed in the individual's record (customer or employee)?</p>	<p>Yes. Payment information may be used for IRS reporting purposes, payment information used to satisfy debt owed or to create new debt (payment cancel) results in updated customer information.</p>
<p>2c. Can the system make determinations about customers or employees that would not be possible without the new data?</p>	<p>No</p>

ATTRIBUTES OF THE DATA	
2d. How will the new data be verified for relevance and accuracy?	Employees verify prior to inputting onto the system. Data is verified by source systems (i.e. System 36 or NPS)
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	Access to data given on a need-to-know basis per FSA-13A. Password and security access protocols are in place to limit users' access to various screens, etc. as well as ACF2 rules for Production files.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	See 3a above.
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Depending on the office and application within CFMIS, data is retrieved using: <ul style="list-style-type: none"> • payment number • State/County • internal data base identifiers • customer, and/or program information • SSN • program code • group entry stamp • county transmission number
4b. What are the potential effects on the due process rights of customers and employees of: <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. 	none
4c. How are the effects to be mitigated?	n/a

Table 5: Maintenance of Administrative Controls

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	Everyone uses the same system. System cannot differentiate between customers. Program regulations state that customers will be treated equitably.

MAINTENANCE OF ADMINSTRATIVE CONTROLS

<p>2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?</p>	<p>Debt Systems n/a - The application and data reside in one site.</p> <p>Payment Systems n/a - The application and data reside in one site.</p> <p>CDS n/a - The application and data reside in one site.</p> <p>FSAFS n/a - The application and data reside in one site.</p> <p>NPS n/a - The application and data reside in one site.</p> <p>Core Systems n/a - The application and data reside in one site.</p> <p>Cash Systems n/a - The application and data reside in one site.</p> <p>Financial Management System (FMS) n/a - The application and data reside in one site.</p>
<p>2b. Explain any possibility of disparate treatment of individuals or groups.</p>	<p>none</p>

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
<p>2c. What are the retention periods of data in this system?</p>	<p>Debt Systems Data is retained for 16 months after the debt balance reaches zero.</p> <p>Payment Systems 18 months for Direct Deposit (ACH) payments; 7 years for NPS Check payments</p> <p>CDS Retention of the Producer demographic data is forever; the retention of the payment data is set to a minimum of 12 months and a maximum of about 18 months on the databases themselves. After that time, the Payments are migrated off onto tape for future use and purged from the mainframe database.</p> <p>FSAFS 7 years</p> <p>NPS 7 years</p> <p>Core Systems Detailed – 24 months General Ledger – 5 years plus current.</p> <p>Cash Systems The retention periods of data in this system are on the TAPEC files for 30, 60, and 90 days. The database is purged every 3 months and this is based on the users specifications for this process.</p> <p>Financial Management System (FMS) Up to 6 years and longer in some instances.</p>
<p>2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?</p>	<p>USDA standard media disposal policy and procedures found in FSA 6-IRM and USDA DR 3602-001.</p>
<p>2e. 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?</p>	<p>Data, after completion, is not altered. The information is protected by agency policies, and the security controls issued by USDA. The key is to ensure the accuracy, etc., of this data prior to entering it into the system. The key method utilized is the Acceptance Testing process.</p>


MAINTENANCE OF ADMINSTRATIVE CONTROLS	
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	No
3b. How does the use of this technology affect customer/employee privacy?	n/a
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	Yes. The Debt component can bar delinquent debtors from future loans based on voluntary information received from the customer.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	Yes. The Debt component can bar delinquent debtors from future loans based on voluntary information received from the customer.
4c. What controls will be used to prevent unauthorized monitoring?	Role-based restriction via User ID
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	<ul style="list-style-type: none"> • Farm Records File (Automated), USDA/FSA-2 • Claims Data Base (Automated), USDA/FSA-13 • Applicant/Borrower, USDA/FSA-14
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	Possibly if the modification results in data, record storage location, or routine use that is not covered by the SORN identified above.

PRIVACY IMPACT ASSESSMENT AUTHORIZATION MEMORANDUM

I have carefully assessed the Privacy Impact Assessment for the
Consolidated Financial Management Information Systems (CFMIS)
(System Name)

This document has been completed in accordance with the requirements of the EGovernment Act of 2002.

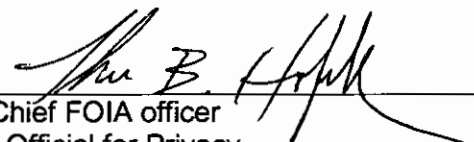
We fully accept the changes as needed improvements and authorize initiation of work to proceed.
Based on our authority and judgment, the continued operation of this system is authorized.



System Manager/Owner
OR Project Representative
OR Program/Office Head

8-15-07

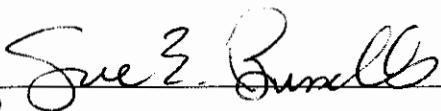
Date



Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

8/31/07

Date



Agency CIO

9/5/07

Date