

## USDA PRIVACY IMPACT ASSESSMENT FORM

**Agency:** Food and Nutrition Service

**System Name:** Food Stamp Quality Control System (FSQCS) Tracking System (TRACKER)

**System Type:** Non-major Application

**System Categorization (per FIPS 199):**  
{(confidentiality, LOW), (Integrity, LOW),  
(Availability, MODERATE)}

**Description of the System:**

The Food Stamp Program (FSP) is the benchmark program in USDA for providing food assistance. At over \$30 billion in annual benefits, the FSP comprises about one-third of the entire USDA budget. In addition to being required by the Food Stamp Act of 1977 and the Improper Payments Information Act of 2002 (IPIA), adequately monitoring a program of this magnitude is essential to ensuring program integrity and safeguarding the investment of the American taxpayer.

The FSP is monitored through its quality control (QC) system. The current FSP QC system, which has been in existence since the 1970's, has been singled out by OMB as the benchmark for compliance with the IPIA. The FSP QC system comprises of State agencies performing QC reviews of a sample of cases followed by FNS regional offices pulling a sub-sample of these cases.

The process includes monitoring the State QC sampling and reporting process, performing validation reviews, reporting to and negotiating review results with States, supporting the arbitration process, running regression and reporting the results to FNS headquarters. The QC process in a regional office typically includes a coordinator, statistician (or similar), and reviewers. The number of reviewers varies among each region and it is not uncommon to have "part-time" reviewers. Some regions also employ reviewers that are assigned to field offices.

Currently each region has its own home-grown system for tracking federal validation reviews. The systems are currently maintained by the regional statisticians. Because they are old systems that are not documented, this becomes a labor-intensive activity for each region. Lack of documentation also poses a problem when there is

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staff turnover. A standard for a comprehensive national system was developed as part of an FNS Leadership Institute project in FY 2006. It is envisioned that a standard tracking system developed and maintained by a contractor would eliminate the need for regional maintenance. With this tool, regional focus can remain on the QC process without taking the time, effort and expertise to maintain an individualized automated system.

Beyond the Access Control List (ACL) for the system, there is no privacy information. The ACL does contain the user's name.

**Who owns this system? (Name, agency, contact information)**

**Food and Nutrition Service  
Food Stamp Program  
Program Accountability Division (PAD)  
Contact: Karen Walker, Director  
(703) 305-2413**

**Who is the security contact for this system? (Name, agency, contact information)**

**Gene Beasley  
USDA/FNS/BRSB  
45 S. 7<sup>th</sup> Street, Suite 1810  
Minneapolis, MN 55402  
(612) 370-3350**

**Who completed this document? (Name, agency, contact information)**

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45 S. 7<sup>th</sup> Street, Suite 1810  
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**DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?**

Indicate whether the following types of personal data are present in the system

<b>QUESTION 1</b>		
Does the system contain any of the following type of data as it relates to individual:	Citizens	Employees
Name	N	N
Social Security Number	Y	N
Telephone Number	N	N
Email address	N	N
Street address	N	N
Financial data	N	N
Health data	N	N
Biometric data	N	N
<b>QUESTION 2</b>	N	N
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 <sup>1</sup>		
Are social security numbers embedded in any field?	Y	N
Is any portion of a social security numbers used?	N	N
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	N	N

**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.

<sup>1</sup> 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.

## DATA COLLECTION

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

FSQCS contains Case Review Numbers (CRN) supplied by the Food Stamp Program (FSP) State Agencies. For some states, this CRN contains a social security number. FSQCS treats this number as a unique identifier in order to assist in following up with State Agencies on particular records. Only a limited number of states use the social security number in their CRNs. No other privacy information is received or stored by FSQCS.

4. 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

5. Sources of the data in the system.

5.1. What data is being collected from the customer?

No data is directly collected from the customer.

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

None.

5.3. What state and local agencies are providing data for use in the system?

FSP State Agencies supply all data.

5.4. From what other third party sources is data being collected?

None

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

Yes

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

No Customer sources.

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

No USDA sources used.

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

FSQCS does not treat the CRN as privacy data but as a case number for reference to State Agency data.

## 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?

FSQCS does not collect data from customers. FSQCS collects data from State Agencies. Some State Agencies embed the SSN in their CRNs. CRNs are used by FSQCS as a reference number relating back to the State Agency.

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

No. If NO, go to question 9

8.1. What are the other purposes?

9. 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

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.)?

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No. If NO, go to question 11

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

No

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

No

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

FSQCS treats the CRN as a unique identifier in order to assist in following up with State Agencies on particular records. FSQCS does not treat this number as a social security number. FSQCS does not generate this number.

11. 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 CRN is created by State Agencies as a unique identifier. Some states have embedded the Social Security Number within the CRN. FSQCS accepts the CRN as a unique identifier of a record.

12. Will the data be used for any other uses (routine or otherwise)?

No. If NO, go to question 13

12.1. What are the other uses?

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?

No. If NO, go to question 14

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

14. Are processes being consolidated?

No. If NO, go to question 15

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

## DATA RETENTION

15. Is the data periodically purged from the system?

No. If NO, go to question 16

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

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

15.3. Where are these procedures documented?

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?

The CRN is created by State Agencies as a unique identifier. Some states have embedded the Social Security Number within the CRN. FSQCS accepts the CRN as a unique identifier of a record.

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

Yes

## DATA SHARING

18. Will other agencies share data or have access to data in this system (i.e. international, federal, state, local, other, etc.)?

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No. If NO, go to question 19

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

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

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

No. If NO, go to question 20

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?

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

No. If NO, go to question 21

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

## DATA ACCESS

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

FNS users and administrators.

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

Need to know. Access and access controls are documented.

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

Yes



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

Users are restricted to their areas of assigned responsibilities.

23.1. Are procedures in place to detect or deter browsing or unauthorized user access?

Yes

24. Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

Yes

## CUSTOMER PROTECTION

25. 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.)?

**Karen Walker**  
**Food and Nutrition Service**  
**Program Accountability Division (PAD)**  
**(703) 305-2413**

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

Contact number above.

27. 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 28

No

27.1. If NO, please enter the POAM number with the estimated completion date:

28. Consider the following:

- Consolidation and linkage of files and systems
- Derivation of data

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- 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)?

No. If NO, go to question 29

28.1. Explain how this will be mitigated?

29. How will the system and its use ensure equitable treatment of customers?

By treating the CRN as only a unique identifier every transaction is treated equally.

30. Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

No. If NO, go to question 31

30.1. Explain

## SYSTEM OF RECORD

31. 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

If NO, go to question 32

31.1. How will the data be retrieved? In other words, what is the identifying attribute (i.e. employee number, social security number, etc.)?

A unique number with the social security number embedded within

31.2. 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.access.GPO.gov))

USDA/FNS-9, Food Stamp Program Retailer Information,  
Federal register vol. 64, No 64, Monday, April 12, 1999

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

NO

## TECHNOLOGY

32. Is the system using technologies in ways not previously employed by the agency (e.g. Caller-ID)?

No. If NO, the questionnaire is complete.

32.1. How does the use of this technology affect customer privacy?

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.

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Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

ES @ C Tracker  
(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.

[Signature] 6/28/07  
System Manager/Owner Date  
OR Project Representative  
OR Program/Office Head.

[Signature] 7/2/07  
Agency's Chief FOIA officer Date  
OR Senior Official for Privacy  
OR Designated privacy person

[Signature] 7/2/07  
Agency OCIO Date