



# **Privacy Impact Assessment**

## **Store Tracking and Redemption System (STARS)**

*Food and Nutrition Service*

*Revision: 1.1*

*Date: July 2008*

Sensitive But Unclassified/Sensitive Security Information – Disseminate on a Need-To-Know Basis Only

Template Release 070606



# Revision and History Page

Document Version #	Revision Date	Description of Change	Section #/ Paragraph #	Page #	Initials
1.0	June 2008	Converted PIA to new OCIO template	All	All	Newberry Group, Inc.
1.1	July 2008	Updated question 11 and 29	Question 11, question 29	8, 13	JSC

## USDA PRIVACY IMPACT ASSESSMENT FORM

**Agency:** Food and Nutrition Service

**System Name:** Store Tracking and Redemption System (STARS)

**System Type:** Major Application

### ***Contents***

This document is composed of organizational contacts, a general system description, and an assessment form containing a series of questions and answers regarding the system privacy data, its attributes, and controls. A completed USDA Privacy Impact Assessment Form as provided in USDA DM 3515-002, Privacy Impact Assessments (PIA) for NEAA is included as Attachment A to this document.

- Major Application  
 General Support System  
 Non-major Application

### **System Categorization (per FIPS 199):**

- **Confidentiality:** Medium
- **Integrity:** MODERATE
- **Availability:** MODERATE

**The overall security level of the STARS is:**

- High  
 Moderate  
 Low

### **Assessment**

STARS stores information on retailers that participate in the Food Stamp Program. This system is used by various federal and state users to track, monitor, and assess retailers.

### **Description of the System:**

STARS II is a full replacement of the STARS System. The Food Stamp Program (FSP) is administered through a headquarters organization, 7 regional offices and 61 field office locations. A team of out-stationed compliance investigators report to headquarters through 4 compliance area offices. These organizations are responsible for managing the benefit redemption functions of the FSP. Cooperating state and local agencies with FNS oversight perform benefit issuance functions.

STARS II provides primary automated support for the FSP benefit redemption functions. Broad responsibilities for public administration are reflected in the composition of the users of the computer system supported by this contract. There are more than 1,000 STARS II IDs issued for direct access to add, delete, and update data and to inquire the status of store redemptions, authorizations and investigations for the approximately 162,000 grocery stores and specialized meal services authorized to deliver food assistance in return for food coupons or electronic benefits. These users include, but are not limited to, the officials responsible for FSP administration and investigation in FNS and in the USDA Office of the Inspector General (OIG), in FSP State agencies as well as the State agencies administering the Women, Infants, and Children (WIC) Program.

STARS II deals primarily with the food benefit redemption process and the monitoring of the retailer organizations that redeem the benefits. The benefit redemption process manages benefit redemption for nearly 24 million recipients, 162,000 retailers, financial institutions, and the Federal Reserve Bank. FNS is directly responsible for monitoring the retailer redemption activity and the financial institution deposit activity; for ensuring the reconciliation of coupon redemption data to coupons processed and destroyed and to debits applied to the FNS redemption account; and for overseeing States who manage client participation. The STARS II System supports the benefit redemption activity, retailer authorization, monitoring and investigation, on-going participation, withdrawal, and disqualification of stores.

The general data type to be used in this system could be classified as public or, at most sensitive, "business sensitive" (when covering sales figures and such). The information in the STARS II system includes SSNs and home addresses for most of the store owners participating or applying to participate in the Food Stamp Program (FSP). The vast majority of the information in the system is not "private" (covered under the Privacy Act). Nor does the system require this data in all cases.

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

Name: Ronald Ward  
Title: Food and Nutrition Service Benefit Redemption Division  
Address: 3101 Park Center Drive, Alexandria VA  
Phone Number: (703) 305-2523  
E-mail: ronald.ward@fns.usda.gov

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

Name: Gene Beasley  
Title: USDA/FNS/BSRB  
Address: 45 S. 7<sup>th</sup> Street, Suite 1810 Minneapolis, MN 55402  
Phone Number: (612) 370-3354  
E-mail: gene.beasley@fns.usda.gov

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

John Coulter  
USDA/FNS/BRSB  
45 S. 7<sup>th</sup> Street, Suite 1810  
Minneapolis, MN 55402  
(612) 370-3354

(converted document to new template)

Newberry Group, Inc.  
2510 Old Hwy 94 South, Suite 200  
St. Charles, MO 63303

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

STARS collects the name, address, and social security number of store owners. In addition, the system collects the name and email address of the system users. Financial information on the individual stores that participate in the food stamp program is also collected.

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  
 No

5. Sources of the data in the system.

5.1. What data is being collected from the customer?

STARS collects name, address, and social security number from all store applicants.

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

FNS only

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

None. State Agency access is read only.

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

On a weekly basis, Electronic Benefit Transfer (EBT) processors provide redemption information for each store in the program.

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  
 No. If NO, go to question 7



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

Store owners, when filling out applications to participate in the program, offer their information. Later, store information is collected and reviewed. As part of the application process the application data in some cases is verified with a visit to the store. Store owners (program applicants) are the source for the more sensitive privacy data

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

System user information is taken directly from the USDA eAuthentication system and is assumed accurate

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

Information from EBT processors is assumed to be accurate

## 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?

For the store owner information collected, that information is used to determine if the owner has a negative history with the Food Stamp program and can be used as a denial reason for future applications. For the store redemption information from the EBT processors, that information is used to determine if a store is still active within the Food Stamp program. For system user information, their name and eAuthentication ID are used to track their actions within the system and their email address is used to send technical tips, release notes, notifications of system outages and planned maintenance to them. In some cases the user name is utilized on letters sent on their behalf to store owners.

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?

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  
 No

**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 (customer or employee)?

- Yes  
 No

10.2. Can the system make determinations about customers 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?

During the processing of store applications, a store visit may be done to verify all information entered. Checks are run on samples of stores annually to verify store and owner information.

**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?

Owner data collected is used to provide history information of that store owner within the food stamp program. The system only keeps information on store owners and their relationship to stores within the Supplemental Nutrition Assistance Program (SNAP). Information contains the name, Social Security Number, Birth date, address, relationship to the store, and if any violations are related to that individual. All of this is identified in the System of Record and is outlined in writing in the FNS-252 form filled out by the store owner.

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

- Yes  
 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?

- Yes  
 No. If NO, go to question 14

Data is being consolidated from the Anti-fraud Locator of EBT Retailer Transactions (ALERT) and Store Investigation Forms System (SIFS) systems. These systems provide financial and investigative case information on stores not individuals. STARS then takes this information and associates it with individuals associated with the stores.

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

Access to privacy information is strictly controlled by role based log-in information. In addition privacy information is encrypted in both transit and storage.

**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?

## DATA RETENTION

**15.** Is the data periodically purged from the system?

- Yes  
 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?

Store owner information is taken from applications submitted by store owners and self-declared information is assumed accurate. As part of the application process, a store visit may be done to verify application information specific to the retail store. Further, samples of store are recertified each year to ensure that the information remains accurate. No store may participate in the program without being recertified every 5 years at a minimum. STARS field offices check store owner information against other applications from the same person as well as documentation submitted with retailer applications to ensure that information is accurate.

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  
State FSP and WIC Agencies.

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

State Agencies use this information to investigate client and/or retailer fraud, to simplify the WIC retailer application process, and to assist in managing their respective areas of responsibility.

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

Each State Agency is required to have a security officer to manage requests and provide oversight relative to State Agency system access. FNS regional and HQ security must also approve access to the system.

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

- Yes
- 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?

- Yes
- No. If NO, go to question 21

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

The system is designed to be used across all sites with the same role-based access controls and safeguards at all sites.

## DATA ACCESS

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

FNS employees who have responsibility for stores in the Food Stamp program will have access to customer information. State Food Stamp program registered users will have access only to the customer name and store redemption history. They will not have access to other privacy

information. Developers and Quality Assurance personnel do not have access to social security information or to the live system. System administrators have access to all information.

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

Users are assigned specific roles before they are able to access the system. Roles control what specific information is available to the system user. All users must have eAuthentication Level 2 prior to accessing the system.

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

- Yes  
 No

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

Access to data is role based as well as based on their location. An example would be that an FNS Field Office employee would only have the ability to change store information on stores within their assigned work area. There are procedures for granting and revoking an account.

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

- Yes  
 No

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

- Yes  
 No

HTTPS is used for encryption in transmission. Privacy data is encrypted in the database. eAuthentication is used for authentication of users.

## **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.)?**

**Ronald Ward  
 Food and Nutrition Service  
 Benefit Redemption Division (BRD)  
 (703) 305-2523**

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

They can call the STARS help desk at (612) 370-3336 or contact their local field or regional office.

**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
- 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 29

28.1. Explain how this will be mitigated?

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

The system does track store owners and their relationship to stores but all investigations and actions are done against stores and not individual store owners. This insures that there is equitable treatment of store owners (Customers).

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

- Yes

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  
 No. 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.)?

eAuthentication Unique identifier (NOTE: NOT their Login ID), for customer data it may be retrieved by either their name or their social security number.

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?

Yes  
 No.

**TECHNOLOGY**

32. 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.

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

## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

STARS Major Application

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.

Ronald K. Ward 7/15/08  
System Manager/Owner Date  
OR Project Representative  
OR Program/Office Head.

S. J. Ni for Sara Bradshaw 7/16/2008  
Agency's Chief FOIA officer Date  
OR Senior Official for Privacy  
OR Designated privacy person

J. M. [Signature] FOR 7/16/08  
Agency OCIO Date