USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: Risk Management Agency

System Name: Comprehensive Information Management System, (CIMS)

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

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

Description of the System:
CIMS is a system of computer programs and databases, physically located in Kansas City, Missouri, to be used in administering the Federal Crop Insurance Corporation, (FCIC) and the Farm Service Agency (FSA) programs. CIMS contains producer, program, and land information collected by FSA, RMA and approved insurance providers (AIPs)from participating customers. CIMS acts as a repository of data and also combines, reconciles, defines, translates, and formats data in such a manner so it can be used by entities that have authorized access to CIMS.
CIMS information will be disclosed to RMA, FSA and AIPs under contract with RMA to implement efficiencies, discover and correct errors in reporting required program information. The electronic information contained in CIMS will be disclosed to RMA, FSA and AIPs under contract with RMA and further disclosed to the AIP's insurance agents and loss adjusters. The electronic information may also be disclosed to any contractor engaged in the development or maintenance of CIMS. Such disclosures are necessary to administer and enforce requirements of the programs administered by RMA and FSA, an integral part of the USDA farm program system.

Who owns this system? (Name, agency, contact information)
RMA Chief Information Officer/Privacy Officer
Vondie O'Conner
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Office (816) 926-7916
Mobile (202) 320-1919

Who is the security contact for this system? (Name, agency, contact information)
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Who completed this document? (Name, agency, contact information)
H. Seavey Anthony
Requirements, Analysis and Validation Branch Chief
CIMS Project Manager and COTR
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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

QUESTION 1 Does the system contain any of the following type of data as it relates to individual:	Citizens	Employees
Name	**Yes**	**Yes**
Social Security Number	**Yes**	**Yes**
Telephone Number	**Yes**	**Yes**
Email address	**Yes**	**Yes**
Street address	**Yes**	**Yes**
Financial data	**Yes**	**Yes**
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.?	Yes	Yes

NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code[1]		
Are social security numbers embedded in any field?	**No**	**No**
Is any portion of a social security numbers used?	**No**	**No**
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	**No**	**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.

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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.

DATA COLLECTION

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

Electronic data that is needed by RMA and FSA for the determination of accurate reporting requirements and which is the basis of monetary benefits.

The FSA data to be used in CIMS consist of electronic Producer and Member Entity Information, including a common producer name, address, tax identifier, identity type, and entity file. It will also include current and prior crop year electronic report acreage information reported to FSA by producers, and acreage determined by FSA, as applicable, and farm and producer identifiers. Electronic production data/information used by both FSA and RMA to establish program benefits is to be added in 2007. This data/information is the basis for determination of accurate monetary benefits. Digital imagery and geospatial data layer containing CLU boundaries, calculated acres, State and county codes, and unique identifiers. A CLU is an electronic representation of the boundaries of a piece of land, represented in latitudes and longitudes. It is the smallest unit of land that has a permanent, contiguous boundary; common land cover and land management; common owner; and common producer association.

The RMA data to be used in CIMS consist of electronic name, address, tax identification number (social security number or employer identification number) of the insured and any person with a substantial beneficial interest in the insured. It will also include the crops insured by crop years, the insured and uninsured acreage, acreage location, crop yield history, and other individual information related to the operation of the crop insurance program. Additional data that is collected from all basic insurance documents; i.e., the application for insurance, the annual acreage report, inspection reports, claim forms, etc, may be added as well. Ineligible individuals or legal entities and their information related to ineligibility such as date and cause of ineligibility, date of notification letter and current status. Information of approved insurance providers, their agents and loss adjusters, such as name, address, telephone number, email address, social security number, agent code, loss adjuster code, and information relating to state licensing.

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?

   CIMS contains producer, program, and land information data collected by Approved Insurance Providers for RMA and by FSA, for their programs.

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

   RMA and FSA

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

   None at this time

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

   None at this time

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?

   CIMS does not collect data directly from customers. CIMS acts as a repository of data that has been processed and accepted by RMA and FSA. It is the collecting agencies, RMA and FSA, which verify the customer data for accuracy, relevance, timeliness, and completeness.

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

   CIMS verifies the completeness of the weekly data files from the collecting agencies, RMA and FSA, validating the number of records sent to the number of records loaded. CIMS also performs secondary edits on the data files during the load process. The accuracy of the data is determined by the collecting agencies, RMA and FSA.

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

   Data is not collected from non-USDA sources

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?

CIMS will be used to help RMA and FSA administer their programs by allowing the agencies to discover and correct errors in reporting and assist the producer to provide consistent information to FSA, RMA, and AIPs.

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 (Section 10706 of the 2002 Farm Bill)
☐ 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

CIMS identifies data by individual and this may be used in the administration of an individual's participation in either RMA or FSA programs

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?

The reconciliation process of the data is done by RMA and FSA Subject Matter Experts, (SMEs).

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?

Both RMA and FSA are amending their existing System of Records to include the following new routine use for CIMS; permits disclosure of certain electronic records in this system through incorporation of these records into the Comprehensive Information Management System (CIMS). FSA added this to their Privacy Act System of Records, USDA/FSA-2 entitled "Farm Records File (Automated)" and RMA added it to the following Privacy Act System of Records: FCIC-8, entitled "List of Ineligible Producers"; FCIC-9, entitled "Agent"; FCIC 10, entitled "Policyholder"; FCIC-11, entitled "Loss Adjuster" and FCIC -2, entitled "Compliance Review Cases".

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

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

USDA users must are restricted by access control lists. Approved users are then restricted to the data available in the pre-defined CIMS reports, based on their assigned user roles. User roles are designated by the CIMS Application Owner.

To ensure that AIPs, and their insurance agents and loss adjusters, are only receiving information related to their specific insured producers, all requests for information provided through CIMS will be automatically validated by CIMS software. Validation is accomplished by checking producer information provided directly to CIMS by data requestors against an RMA maintained database of accepted policies incorporated into CIMS. AIPs will be required to sign a non-disclosure statement before accessing CIMS to preclude them from using the information for an unauthorized purpose or releasing the information to an unauthorized person or the public.

14. Are processes being consolidated?

☐ Yes
☒ No. If NO, go to question 15

At this time, the collecting agencies retain administrative controls of the acceptance processing of the data

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?

The system retains 3 years of data., (Current processing year and the two previous years). The fourth year is retained on back up media according to the RMA retention policy. The Daily and weekly back up tapes are retained for 1 month. Monthly versions are retained for 3 years and the yearly version is retained for 7 years

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

The 3 year and 7 year back up tapes are destroyed. The daily and weekly media are recycled into the media into the scratch pool, which allows the current data to be overwritten with new data.

15.3.   Where are these procedures documented?

        Procedures for reuse of media are documented in the RMA Operations Procedural Handbook, and requirements for data sanitation and reuse are in RMA Security Policy 10042.

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?

    Periodic restores are done to validate that the data is being backed up and able to be restored if necessary. CIMS acts as a repository of data that has been processed and accepted by the collecting agencies, RMA and FSA, which verify the customer data for accuracy, relevance, timeliness, and completeness for that month. The reconciliation process of the retained data will need to be done by RMA and FSA Subject Matter Experts, (SMEs).

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

    Currently agencies can only access the CIMS data via web applications. There is not data transfer to other agencies systems.

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?

☒ 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?

CIMS provides data to approved insurance providers (AIPs), as defined in section 502(b) of the Federal Crop Insurance Act (7 U.S.C.1502(b)). AIPs, agent and loss adjusters will be required to sign a non-disclosure statement to preclude them from using the information for an unauthorized purpose or releasing the information to an unauthorized person or the public, before being able to access CIMS.

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?

DATA ACCESS

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

USDA Manager, Farm and Foreign Agricultural Services (FFAS) managers, system administrators, developers, FSA State and County Office personnel, RMA personnel, Approved Insurance Providers under contract with RMA, and their agents and loss adjusters

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

RMA and FSA user access are governed by access control lists of approved users. Access to the CIMS data reports for the Approved Insurance Providers (AIP) is granted to any AIP that has existing security to the RMA IP server. CIMS data can be requested for insured producers that have been accepted by RMA, loaded into CIMS and only for the AIP's insured customers.

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

☒ Yes
☐ No

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

RMA and FSA users are restricted to the data available in the pre-defined CIMS web reports, based on their assigned user roles. User roles are designated by the agency project manager and the CIMS Application Owner.

Approved Insurance Providers are restricted to the data for their insured producers who have been accepted in the RMA system. CIMS validates the insured producers against the RMA policy data. The RMA and FSA project managers determined the data AIPs can access based on the type of request.

Data will only be disclosed to the AIPs, their insurance agents and loss adjusters, for information associated with their insured producers and only with regard to such producers' farming operations contained in counties covered by their policies. Records are accessible only to authorized personnel and are maintained in offices that are locked during non-duty hours.

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

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.)?

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

  CIO@rma.usda.gov

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:
      RMA cannot add "non-assessment" type POAMs into ASSERT. However it should be 4139, with a completion date of 9/28/2007.

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?

  CIMS acts as a repository of data that has been processed and accepted by RMA and FSA. It is the collecting agencies, RMA and FSA, which ensure equitable treatment of 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

CIMS is a "post service application" and provides analysis or may identify discrepancies in customer reported information that may lead to some type of action as a result of access to the information or of analysis. CIMS helps the agencies to identify what has happened or been reported verses deciding on how to treat a customer.

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.)?

Records are indexed by State, county and policy number. Records may be indexed and retrieved by name of individual, tax identification number (social security number or employer identification number), policy number, year, crop and common land unit, (CLU). A CLU is an electronic representation of the boundaries of a piece of land, represented in latitudes and longitudes. It is the smallest unit of land that has a permanent, contiguous boundary; common land cover and land management; common owner; and common producer association..

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)

The following Privacy Act System of Records are being modified to incorporate the CIMS as a routine use:
        USDA/FSA-2 entitled Farm Records File (Automated)
        USDA/FCIC-8, entitled List of Ineligible Producers;
        USDA/FCIC-9, entitled Agent;
        USDA/FCIC 10, entitled Policyholder;
        USDA/FCIC-11, entitled Loss Adjuster
        USDA/FCIC -2, entitled Compliance Review Cases.

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

        Amendment

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

Comprehensive Information Management System, (CIMS)

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.

_____**//s//** _____ **6/21/2007**_____

H. Seavey Anthony, (System Manager/Owner)   Date
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_____**//s//**_____ **6/21/2007**_____

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_____**//s//**_____ **6/21/2007**_____

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