



UNITED STATES DEPARTMENT OF  
**AGRICULTURE**

**FARM SERVICE AGENCY**

**Privacy Impact Assessment (PIA)  
For  
Cotton Management System  
(CMS)**

- Automated Cotton Reporting System (ACRS)
- Cotton Online Processing System (COPS)

**FINAL**

**Update Date: August 19, 2007**

**Accreditation Date:**



**Farm Service Agency  
ADC/PSCAO/CLG  
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**Document Control**

Date	Source	Author	Description of Changes
			Original document.
07/09/2004		DSD	Original Document
07/23/2004		PFW	CMS Final Document -Combined ACRS, COPS and CRTS documents into single CMS document -Made corrections to information in draft documents.
02/13/2007	See Description of Changes	LK/PFW	<b>From SP dated 12/28/06:</b> -Added new documentation to 2.2.2 COPS <b>From PIA dated 07/2004:</b> <b>-Table 2: Data In the System:</b> -1. Reworded CRTS information to COPS information. <b>-Table 2: Access to the Data:</b> -5a. added: -...IRS reporting, PPRS -e-LDP has calculation information interface with COPS -COPS interfaces with State/County cotton PCs.
03/21/2007	Chris Hoover, EDS	Chris Hoover, EDS	SME Approved
04/04/2007	Eric Miller, ISO	Eric Miller, ISO	ISO Approved
06/06/2007	J Wagner, EDS	J Wagner, EDS	Question regarding a change to the SORN was answered "N/A." Changed to possibly if data, record storage location or routine use changes. Changed update date on cover and header.
08/07/2007	OCIO Template	J Wagner, EDS	Added Signature Page
08/19/2007	ISO	E. Miller, ISO	Final ISO Review, Insert fax signature

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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 CMS 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
Cotton Management System (CMS)	<ul style="list-style-type: none"> <li>• Automated Cotton Reporting System (ACRS)</li> <li>• Cotton Online Processing System (COPS)</li> </ul>

### 2.2 System Overview

#### 2.2.1 Automated Cotton Reporting System (ACRS)

ACRS activities consist of Cotton Price Support Program Loans that CCC disburses through commercial banks to approved Cotton Marketing Associations (CMA) and Loan Servicing Agents (LSA). Major business functions include:

- record activity for price support activity disbursed to CMAs and LSAs
- reconcile fund transfer activity with bale-detail price support transactions
- record general ledger entries into CCC's CORE accounting system
- resolve errors and reconcile price support registers with CCC accounts
- maintain a central file system of bale detail records by crop year and by transaction
- receive and report IRS reportable data to producers, and provides on-line inquiry and ad hoc reporting capabilities.

#### 2.2.2 Cotton Online Processing System (COPS)

COPS is a web accessible application used by KCAO, WDC, KCCO, DACO County Offices, State Offices, Cotton Marketing Associations (CMA), Loan Servicing Agencies (LSA), Providers, Warehouses, Master Warehouses, Warehouse Examiners and Cotton Merchants. CRTS (incorporated into COPS) supports the exchange and accountability of all electronic warehouse receipts used to process price support loans and loan deficiency payments made at FSA counties, CMAs and LSAs. Major business functions include:

- validate cotton loan/LDP activity
- generate producer storage collection invoices
- generate provider quarterly invoices
- update bales on forfeited loans
- generate payable storage invoices
- forecast future sales
- create sales catalogs for CCC-owned cotton
- receive bids online from buyers
- analyze and award bids
- generate buyer invoice on final sale

- update support files
- record general ledger entries into CCC's CORE accounting system,
- process re-concentration orders
- process claims for fire losses
- pending user maintenance
- cotton sale reporting
- cotton bale, loan, and error inquiry
- bale detail, history, electronic receipt, warehouse rates and classing inquiry
- centralized cotton (certificate and P&I) redemption (CCR)
- release of electronic receipts
- re-classing of bales
- change Electronic Agent Designation (EAD) status of bales on loan
- provide CCC-719 reporting
- search capabilities via many different criteria
- inquiry on current and past COPS user's bulletins
- warehouse rate renewal and entry
- warehouse examination history and statistical sampling
- warehouse information maintenance
- online warehouse reports
- warehouse successor assignment
- warehouse support functions
- generate warehouse A&I invoices
- eLDP calculation interface
- AMS cotton classing data directly from Regional Classing Offices
- record activity of electronic cotton warehouse receipts receiving price support benefits
- obtain classing data from the Agricultural Marketing Service (AMS) for FSA County price support activities
- release electronic warehouse receipts to previous holders, warehouses, and merchants
- resolve errors
- maintain a central file system
- provide on-line inquiry and ad hoc reporting capabilities
- download electronic warehouse receipt and AMS classing data to FSA Counties

## USDA PRIVACY IMPACT ASSESSMENT

**Table 2: Data In The System**

DATA IN THE SYSTEM	
1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.	<p>ACRS provides cotton price support loan disbursement information on customers.</p> <p>COPS provides information on loan disbursements, redemptions, warehouse Inventory, electronic warehouse receipt data, social security numbers and Tax IDs. Social security numbers/tax IDs will be masked effective March 2, 2007 on customers.</p> <p>Employee and other: None for both COPS and ACRS.</p>
2a. What are the sources of the information in the system?	<p>ACRS: Customers (CMAs/LSAs) provide cotton price support loan disbursement information.</p> <p>COPS: Customers (State &amp; County Offices/APSS, Cotton Buyers, Warehouses provide information on loan disbursements, redemptions, warehouse Inventory, and (Providers) provide electronic warehouse receipt data.</p>
2b. What USDA files and databases are used? What is the source agency?	COPS uses AMS and APSS information. AMS and FSA
2c. What Federal Agencies are providing data for use in the system?	ACRS – none COPS – FSA and AMS
2d. What State and Local Agencies are providing data for use in the system?	None
2e. From what other third party sources will data be collected?	<p>ACRS - LSAs and CMAs</p> <p>COPS - Cotton Merchants, Providers, The Seam, Warehouses, Master Warehouses and Warehouse Examiners.</p>
2f. What information will be collected from the customer/employee?	Tax ID/Social Security Numbers, name, address, quantity.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	System validation checks are performed. External processes are used as required to verify/validate the accuracy of the provided data.

DATA IN THE SYSTEM	
3b. How will data be checked for completeness?	System validation checks.

**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)?	<p>ACRS - via CICS/VB:                      -FSA Core Users – Read only.                      COPS - via Internet:                      -County Offices – Read Only                      -State Specialists – Read Only                      -CMAs/LSAs – Read Only                      -Cotton Merchants – Read Only                      -Warehouses, Master Warehouses – Read and update limit to user's data.                      -Warehouse Examiners – Read Only                      -FSA Core Users – Read and user specific limited update.                      -COPS Core Users – Read and user specific limited update.</p> <p>COPS – via Client Access/VB:                      -FSA KCCO – read and user specific limited update.                      Data File Sharing/FTP transmissions:                      ACRS:                      -via FTP/CMAs and LSAs                      -via mainframe APSS, PPRS                      COPS:                      -via FTP/Cotton Buyers, APSS, CORE, CDS, Providers                      -via Telnet/AMS</p>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Access is obtained by submitting Form FSA-13A and approving official grants access to the system as identified in the TFM dated 7/31/04



ACCESS TO THE DATA	
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	<p>Limited by user's roles.</p> <p>ACRS (CICS &amp; FTP) NITC ACF2 rules on NITC IDs provide access levels based on discretionary access control methods.</p> <p>COPS (Internet and FTP) -NITC ACF2 rules on NITC IDs provide access levels based on discretionary access control methods.</p> <p>COPS (Internet) - NITC IDs and entity types are validated for option access controls. - NITC IDs are validated to Security groups for update authority. -NITC ACF2 rules on NITC IDs provide access levels based on discretionary access control methods.</p>
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Role enforced separation of duties, need to know, and awareness and training.
5a. Do other systems share data or have access to data in this system? If yes, explain.	<p>APSS, CORE, CDS, ED3, IRS reporting, and PPRS share information via mainframe data sets. AMS via TelNet link between AMS and NITC mainframe. CMAs, LSAs, Providers, The Seam and Cotton Merchants via TCP/IP FTP transmissions and Warehouses. e-LDP has calculation information interface with COPS. COPS interfaces with state and county Cotton PCs.</p>
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	System users and managers; Designated Approval Authority
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	None outside of FSA.
6b. How will the data be used by the agency?	Inquiry to support Department of Agriculture Farm Programs and Department of Agriculture Commodity Operations Programs.

ACCESS TO THE DATA	
6c. Who is responsible for assuring proper use of the data?	All users.

**Table 4: Attributes Of The Data**

ATTRIBUTES OF THE DATA	
1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes. See section 2.2 above.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	no
2b. Will the new data be placed in the individual's record (customer or employee)?	n/a
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	n/a
2d. How will the new data be verified for relevance and accuracy?	n/a
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	Data is not being consolidated.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	n/a
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	-Via COPS, user id and password verified through NITC ACF2 rules. -No -Personal identifiers cannot be retrieved.
4b. What are the potential effects on the due process rights of customers and employees of: <ul style="list-style-type: none"> <li>consolidation and linkage of files and systems;</li> <li>derivation of data</li> <li>accelerated information processing and decision making;</li> <li>use of new technologies.</li> </ul>	n/a
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.	Users will be granted access based upon business requirements. All customers and employees using CMS (ACRS and COPS) use the same system and have access through a similar method on a need to know basis.
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?	Kansas City system is operational from single site (NITC mainframe and web farm).
2b. Explain any possibility of disparate treatment of individuals or groups.	None
2c. What are the retention periods of data in this system?	Data is retained indefinitely.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	n/a
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?	n/a
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.	Customer Tax ID number cannot be used to access or use any other specific information on any individual for any monitoring purposes. Addresses are not maintained in CMS.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	no
4c. What controls will be used to prevent unauthorized monitoring?	NITC mainframe and web server firewalls. ACF2 rules or system on access.
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	<ul style="list-style-type: none"> <li>• USDA/FSA-2 – Farm Records File</li> <li>• USDA/FSA-14 – Applicant/Borrower</li> </ul>

**MAINTENANCE OF ADMINSTRATIVE CONTROLS**

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

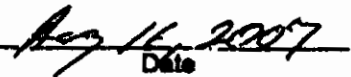
I have carefully assessed the Privacy Impact Assessment for the


Cotton Management System (CMS)  
(System Name)

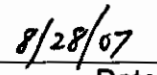
This document has been completed in accordance with the requirements of the EGovernment Act of 2002.

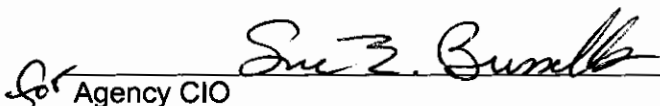
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

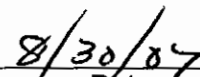
  
\_\_\_\_\_  
System Manager/Owner  
OR Project Representative  
OR Program/Office Head

  
\_\_\_\_\_  
Date

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

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
for Agency CIO

  
\_\_\_\_\_  
Date

## Appendix A - Acronyms

Acronym	Definition
ACF2	Access Control Facility - 2
ADC	(FSA) Application Development Center
ADM	(USDA) Administrative Management Handbook
ADPO	(FSA) Application Development Program Office
AMS	Agricultural Marketing Service
AO	(FSA) Architecture Office
APSS	Automated Price Support System
BAO	(FSA) Budget & Acquisition Office
BRP	Business Resumption Plan
CC	Configuration Control
CCA	Change Control Authority
CCB	Configuration Control Board
CCC	Commodity Credit Corporation
CCE	(ITS) Common Computing Environment
CDS	Centralized Disbursement System
CI	Configuration Item
CM	Configuration Management
CMA	CM Authority
CML	CM Librarian
CMP	CM Plan
CMS	CM Specialist
COTS	Commercial Off the Shelf
CR	Change Request
CS	(USDA-OCIO) Cyber Security
CSA	Configuration Status Accounting
CVA	Configuration Verification and Audit
DAA	Designated Accrediting Authority
DM	Department Manual
DR	Department Regulation
EAS	(FSA) Extensible Authorization System
eAuth	(USDA) Electronic Authentication
ED3	Electronic Distribution of Disbursement Data
eLDP	Electronic Loan Deficiency Payment
FCA	Functional Configuration Audit
FTP	File Transfer Protocol
GSS	General Support System
HRO	(FSA) Human Resources Office
HWCi	Hardware Configuration Item
IRM	Information Resources Management
ISO	(FSA) Information Security Office
ISSPM	(FSA) Information System Security Program Manager
IT	Information Technology
ITS	(USDA-OCIO) Information Technology Services
ITSD	(FSA) Information Technology Services Division
KCCO	Kansas City Commodity Office

Acronym	Definition
LAN	Local Area Network
LSA	Loan Servicing Agent
MA	Major Application
MRT	(ITS) Master Reference Table
NFC	National Finance Center
NIST	National Institute of Standards and Technology
NITC	(USDA-OCIO) National Information Technology Center
OCIO	(USDA) Office of the Chief Information Officer
OMB	Office of Management & Budget
OTC	(FSA) Operations & Testing Center
PCA	Physical Configuration Audit
PM	(USDA) Personnel Management Handbook
POAM	Plan of Action & Milestones
SBU	Sensitive But Unclassified
SCM	Software CM
SWCI	Software Configuration Item
TFM	Trusted Facilities Manual
TIN	Taxpayer Identification Number
USDA	United States Department of Agriculture
WDC	Washington, DC