



UNITED STATES DEPARTMENT OF
AGRICULTURE

FARM SERVICE AGENCY

**Privacy Impact Analysis (PIA)
for
Direct Counter-Cyclical Payments
(DCP)**

- Signup, Web
- Payments/Overpayments, AS/400
- End-of-Year Review

FINAL

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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 the Direct Counter-Cyclical Payments 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
Direct Counter-Cyclical Payments (DCP)	Direct Counter-Cyclical Payments Enrollment & Payment System <ul style="list-style-type: none"> • Signup • Payments/Overpayments • End-of-Year Review

2.2 System Overview

2.2.1 Signup

The FSA Direct Counter-Cyclical Payment Enrollment and Payment System (DCP) is an application that collects information that will assist FSA with issuing direct payments to producers for covered commodities including oilseeds, and peanuts. In order for the farmers to be eligible for this service, sign up is required. The services provided include, but are not limited to, authorizing direct and counter-cyclical payments to enrolled farmers.

2.2.2 Payments/Overpayments

The FSA Direct Counter-Cyclical Payment System (DCP) is an application that receives the approved contracts from the Enrollment system and then computes payments using the base acres and payment yields established for each farm. Farmers receive direct payments at rates established by statute regardless of market prices. On the other hand, counter-cyclical payments rates vary depending on market prices. Counter-cyclical payments are issued only when the effective price (which takes into account the direct payment rate, market price and loan rate) for the crop is below the target price for the commodity.

2.2.3 End-of-Year Review

The End-of-Year Review is a report generator that provides a list of farming operations that are comprised of both individuals and as entities (joint operations and joint ventures), along with their respective payment eligibility and payment limitation requirements for the year selected, which are then manually reviewed and compared to the operation's CCC-502 and other program documents/certifications received during the program year. The purpose is to extract the entities which have the highest potential for possible abuse of the payment limitation rules. The selection process results in approximately 2500 operations nationwide, or about 1% of the participants for the year selected.

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>Signup, Payments/Overpayments, End-of-Year Review:</p> <p>Customer : Name, address, ID number, farm number, crop, base acres, direct yield, counter cyclical yield, producer share data, direct advance date (month and year), counter cyclical advances, refuse payment flag.</p> <p>Employee & Other: N/A</p>
<p>2a. What are the sources of the information in the system?</p>	<p>Signup Farm records, SCIMS and User inputs of i) Shares ii) Payment Flags iii) Signature Date.</p> <p>Payments/Overpayments Farm records, Name and Address</p> <p>End-of-Year Review Farm records, Name and Address</p>
<p>2b. What USDA files and databases are used? What is the source agency?</p>	<p>Signup</p> <p>EAS,CBS(Common Business Service),Compliance web Service, Farm Records,SCIMS and eREP(Electronic Representation)</p> <p>Payments/Overpayments Farm records, Name and Address</p> <p>End-of-Year Review Farm records</p>
<p>2c. What Federal Agencies are providing data for use in the system?</p>	<p>Signup,Payments/Overpayments, End-of-Year Review FSA is the only agency providing data for the DCP contract.</p>
<p>2d. What State and Local Agencies are providing data for use in the system?</p>	<p>None</p>
<p>2e. From what other third party sources will data be collected?</p>	<p>None</p>

DATA IN THE SYSTEM	
2f. What information will be collected from the customer/employee?	<p>Signup The base acre and yield data are predetermined based on the 2002 Farm Bill. The only information collected from the customer by the FSA employees is specific producer share data applicable to each crop, advance direct payment month and year, first and/or second advance counter cyclical request or refuse payment request.</p> <p>Payments/Overpayments None.</p> <p>End-of-Year Review None.</p>
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	<p>Signup, Payments/Overpayments, End-of-Year Review</p> <p>None collected</p>
3b. How will data be checked for completeness?	<p>Signup, Payments/Overpayments In order to receive DCP benefits, producer shares for all crops must equal 100 percent. The system currently validates this. County Office employees must ensure that all producers on the contract have timely signed. The county committee must review the contract and provide approval prior to any benefits being issued.</p> <p>End-of-Year Review N/A</p>

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>Signup, Payments/Overpayments, End-of-year Review County office employees, system developers, system testers, System administrators</p>

ACCESS TO THE DATA	
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	<p>Signup, eAuth Level 2 access is required. Yes, documentation is available.</p> <p>Payments/Overpayments, End-of-Year Review: Authorized User Ids and password are utilized. Yes, Documentation is available.</p>
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	<p>Signup Access to DCP contract is controlled by eAuth.</p> <p>Payments/Overpayments, End-of-Year Review: In the current AS/400 environment, county office employees can access the data that resides on the AS/400 only.</p>
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	<p>Signup, Payments/Overpayments: County office committee validates before approving the application for payment.</p> <p>End-of-Year Review: N/A</p>
5a. Do other systems share data or have access to data in this system? If yes, explain.	<p>Signup, Payments/Overpayments, End-of-Year Review: No</p>
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	<p>Signup, Payments/Overpayments, End-of-Year Review: N/A</p>
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	<p>Signup, Payments/Overpayments, End-of-Year Review: No</p>
6b. How will the data be used by the agency?	<p>Signup, Payments/Overpayments, End-of-Year Review: N/A</p>
6c. Who is responsible for assuring proper use of the data?	<p>Signup, Payments/Overpayments, End-of-Year Review: N/A</p>

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?	Signup, Payments/Overpayments, End-of-Year Review: Yes. Without the data the customer benefits cannot be calculated and/or disbursed.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	Signup, Payments/Overpayments, End-of-Year Review: No new data.
2b. Will the new data be placed in the individual's record (customer or employee)?	Signup, Payments/Overpayments, End-of-Year Review: N/A
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	Signup, Payments/Overpayments, End-of-Year Review: N/A
2d. How will the new data be verified for relevance and accuracy?	Signup, Payments/Overpayments, End-of-Year Review: N/A
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	Signup, Payments/Overpayments, End-of-Year Review: Data is not consolidated.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Signup, Payments/Overpayments, End-of-Year Review: N/A
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Signup: The data - producers personal information is retrieved by using SCIMS. This retrieves all potential DCP contracts for the producer. Payments/Overpayments End-of-Year Review: N/A.

ATTRIBUTES OF THE DATA	
<p>4b. What are the potential effects on the due process rights of customers and employees of:</p> <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. 	<p>Signup, Payments/Overpayments , End-of-Year Review: N/A</p>
<p>4c. How are the effects to be mitigated?</p>	<p>Signup, Payments/Overpayments, End-of-Year Review: N/A</p>

Table 5: Maintenance Of Administrative Controls

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
<p>1a. Explain how the system and its use will ensure equitable treatment of customers and employees.</p>	<p>Signup, Payments/Overpayments, End-of-Year Review: The policy and procedures regarding the program are provided for use when administering the program. The same payment rates are used nationwide. DCP contract acres and bases were calculated in 2002 and producers were provided appeal rights at that time. Base acres and yields will remain the same throughout the program unless a change is made in the farming operation.</p>
<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>Signup: DCP contract is centralized on the web. All users are presented with the same web pages and subject to the same business logic. Payments/Overpayments, End-of-Year Review: All sites are provided the same policy and procedure. Each site maintains their own AS/400; however, all sites receive the same software releases.</p>
<p>2b. Explain any possibility of disparate treatment of individuals or groups.</p>	<p>Signup, Payments/Overpayments, End-of-Year Review: None</p>
<p>2c. What are the retention periods of data in this system?</p>	<p>Signup, Payments/Overpayments, End-of-Year Review: Undetermined</p>

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Signup, Payments/Overpayments, End-of-Year Review: 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?	Signup: Data is always kept synchronized in between SCIMS and Farm Records. Payments/Overpayments, End-of-Year Review: Any time a change occurs in an application (Cancel etc.) a new application is submitted to process the payment.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	Signup, Payments/Overpayments, End-of-Year Review: No
3b. How does the use of this technology affect customer/employee privacy?	Signup, Payments / Overpayments, End-of-Year Review: N/A
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	Signup, Payments/Overpayments, End-of-Year Review: No
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	Signup, Payments/Overpayments, End-of-Year Review: No
4c. What controls will be used to prevent unauthorized monitoring?	Signup, Payments/Overpayments, End-of-Year Review: N/A
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	Signup, Payments/Overpayments, End-of-Year Review: USDA/FSA-2 – Farm Records File (Automated)
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

Direct Counter-Cyclical Payments (DCP)
(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.

Subeca Daskill

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

8-13-07
Date

Shirley B. Hight

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

8-31-07
Date

La Sue E. Small
Agency CIO

9/5/07
Date

Appendix A - Acronyms

AIS	Automated Information System
C2	Controlled Access Protection, Class Two
CD-ROM	Compact Disk-Read Only Memory
CMP	Configuration Management Plan
COMPUSEC	Computer Security
COMSEC	Communications Security
COOP	Continuity of Operations Plan
USDA	United States Department of Agriculture
FOIA	Freedom of Information Act
FOUO	For Official Use Only
FSA	Farm Service Agency
FTP	File Transfer Protocol
HP	Hewlett Packard
I&A	Identification and Authentication
IAW	In accordance with
ID	Identification
INFOSEC	Information Security
IP	Internet Protocol
ISSO	Information Systems Security Officer
LAN	Local Area Network
NCSC	National Computer Security Center
NRCS	Natural Resources Conservation Service
NT	New Technology
OPSEC	Operations Security
PA	Privacy Act
SA	System Administrator
SAAR	System Authorization Access Request
SBU	Sensitive-but-Unclassified
SCIMS	Service Center Information Management System
SFUG	Security Features User Guide
SLC	System Life Cycle
SOP	Standing Operating Procedure
SQL	Structured Query Language
STD	Standard
TFM	Trusted Facility Manual
TG	Trusted Guide
USERID	User Identification
U.S.C	United States Code
WWW	World Wide Web

Appendix B - DCP – Specific Acronyms

DCP	Direct Counter-Cyclical Payments
CBS	Common Business Service
DAFP	Deputy Administrator, Farm Programs
PECD	Production, Emergency, and Compliance Division
Erep	Electronic Representation
EAS	Extensible Authorization