

USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: USDA Rural Development

System Name: Program Funds Control System (PFCS)

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

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

Description of the System:

FSA and RD replaced their legacy system funds control processes with Program Funds Control System (PFCS), utilizing the Oracle Federal Financials commercial off-the-shelf (COTS) software package, and is certified by the Joint Financial Management Improvements Program (JFMIP). PFCS replaced the appropriation accounting systems and automated manual processes which were integrated into four large, legacy systems. PFCS is independent from these systems, but supports all budget, funds management, funds control, and funds reporting functions required by those loan and grant program legacy systems. PFCS provides financial data in electronic form for posting to the existing Financial General Ledger system.

FSA and RD Budget Staffs initially enter approved funding data into PFCS. Apportionments, allocations, and distributions are subsequently established by Budget, Financial, and Program management staffs based on legislative and regulatory directives and guidance. Funds requests, in the form of transactions such as reservations, commitments, and obligations (all of which can originate at service center, district, state or national office levels), are then processed verifying funds availability for that specific action. If funds are available, the request is approved and updates the files accordingly, reducing the amount of funds available for the next request. Reports, ad hoc as well as fixed format, are available through online query and/or overnight processing. Funding information is available to all management levels upon request, and is more timely and accurate than in the previous environment.

Who owns this system?

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Who is the security contact for this system?

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USDA PRIVACY IMPACT ASSESSMENT FORM

DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?

QUESTION 1		
Does the system contain any of the following type of data as it relates to individual:	Citizens	Employees
Name	No	Yes
Social Security Number	Yes	No
Telephone Number	No	Yes
Email address	No	Yes
Street address	No	No
Financial data (i.e. account numbers, tax ids, etc)	Yes	No
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	No
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?	Yes	No
Is any portion of a social security numbers used?	Yes	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:

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.

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.

USDA FSA and Rural Development employees use the PFCS to control funds appropriated by congress for specific purposes in support of the farmers and rural community. USDA FSA and Rural Development staff with access to PFCS includes Budget, Finance, Program, and State Offices.

4. Is the collection of the data both relevant and necessary to the purpose for which the system is designed? In other words, the data is absolutely needed and has significant and bearing on the system’s purpose.

- Yes
- No. If NO, go to question 5

4.1. Explain.

Funds control is required by law to prevent “anti-deficiency”, spending more money than is appropriated by Congress.

5. Sources of the data in the system.

5.1. What data is being collected from citizens and/or employees?

No data is collected directly from citizens. The data is entered into the Farm Service Agency (FSA) system, Guaranteed Loan Servicing (GLS), FiServ – Loan Servicing Platform (formerly known as MortgageServ), Rural Utilities Loan Servicing System (RULSS), and Program Loan Accounting System (PLAS) systems and passed to PFCS through real time files or batch files. The transactions from these systems may include customer social security number or federal tax id. The employee data collected includes the system user id for audit trail purposes.

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

Sources of the information include Congressional appropriated funds approved by the Office of Management and Budget (OMB). Using the OMB approved apportionments, USDA program staff for FSA and Rural Development enter allotments and allocations of funds for specific and targeted areas on PFCS. Obligation requests are entered by USDA FSA and Rural Development employees in their respective system (PLAS, MortgageServ, GLS, and RULSS).

5.3. What government agencies (state, county, city, local, etc.) are providing data for use in the system?

OMB provides the approved apportionments by Treasury Symbol. FSA and Rural Development use PFCS for control and management of congressionally approved funds.

No state and local agencies provide data.

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

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No third party sources provide data.

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

- Yes
 No. If NO, go to question 7

Only data from USDA records is used in PFCS. OMB provides the approved apportionments by Treasury Symbol.

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

USDA uses separation of duties for all financial and accounting functions. Only authorized, reviewed, and approved transactions will be allowed to process on PFCS. Other government over-site agencies, such as the Government Accountability Office (GAO), the Office of Inspector General (OIG), The Office of the Chief Information Officer - Cyber Security, and the Office of the Chief Financial Officer (for A-123) also provide review.

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

- 6.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness? No data is 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?

PFCS is a tracking system for allocated program funds for PLAS, MortgageServ, GLS, and RULSS systems. Each system can then obligate available funds for program loans and grants. Funds control is required by law to prevent “anti-deficiency”, spending more money than is appropriated by Congress.

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 used? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system’s purpose.

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- Yes
 No. If NO, go to question 10

9.1. Explain.

PFCS is a tracking system for allocated program funds for PLAS, MortgageServ, GLS, and RULSS systems. Each system can then obligate available funds for program loans and grants. Funds control is required by law to prevent “anti-deficiency”, spending more money than is appropriated by Congress.

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

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?

PFCS is a tracking system for allocated program funds for PLAS, MortgageServ, GLS, and RULSS systems. Each system can then obligate available funds for program loans and grants. Funds control is required by law to prevent “anti-deficiency”, spending more money than is appropriated by Congress.

12. Will the data be used for any other purpose (other than indicated in question 11)?

- Yes
 No. If NO, go to question 13

12.1. What are the other purposes?

Not applicable.

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?

Not applicable.

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14. Are processes being consolidated?

- Yes
 No. If NO, go to question 15

DATA RETENTION

15. Is the data periodically purged from the system?

- Yes
 No

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

FSA recently issued regulations that data must be kept indefinitely. To date, PFCS has not archived any data.

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

FSA recently issued regulations that data must be kept indefinitely.

15.3. Where are these procedures documented?

To date, PFCS has not archived any data.

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 Rural Development and FSA Finance Offices review the data daily via reports. PFCS has multiple system checkpoints in place that notify the system administrators/operators verifying that all jobs run to completion.

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

- Yes – See # 16
 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

Government oversight agencies such as OMB, GAO, OCIO-CS, OCFO, and OIG may be granted limited access for oversight and auditing purposes.

USDA PRIVACY IMPACT ASSESSMENT FORM

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

The data is used to ensure that FSA, MortgageServ, GLS, PLAS, and RULSS protect the privacy of the customer, compliance with Departmental and Federal policy and regulations for securing information technology systems. The data is used to audit the effectiveness of security controls and adherence to system development life cycle guidance.

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

The System Owner

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

- Yes
 No.

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?

Non Applicable

19.2. Where are those documents located?

Non Applicable

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

- Yes
 No. PFCS is only operated at one site.

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

Non Applicable

DATA ACCESS

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

Update authority for PFCS is limited to FSA and Rural Development employees in the respective Budget Offices, Program Offices, Financial Management Divisions, and System Administrators. Inquiry authority is limited to authorized representatives in USDA field offices, software developers (i.e. technical support staff), and the government oversight agencies.

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

Access is controlled by user id and password. Access rights are granted to designated individuals only when their supervisor approves a written request.

Desk procedures document the process for establishing, activating, and modifying ID's. System owners define this process. System owners define groups and account types. System Points of Contact (POC) assign group membership and determine need-to-know validation. The POC is responsible for verifying user identification; the User Access Management Team (UAMT) relies

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on a POC supplying the correct user id and password to Logbook to identify themselves. Log Book tickets are the tool used to track authorized requests by approving POC.

Currently Rural Development reviews reports from Human Resources on a bi-weekly basis. The organization employs automated mechanisms to support the management of information system accounts. Temporary and emergency accounts are not used or authorized. Information System Security Staff (ISSS) UAMT does not manage guest or anonymous accounts. POC's (empowered by Rural Development IT managers) are responsible for notifying UAMT if access or roles need to be modified. It is also their responsibility to periodically review and certify established access.

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

- Yes – See Above
 No. If NO, go to question 23

22.2. Where are criteria, procedures, controls, and responsibilities regarding user access documented?

See Above (Question 22).

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

User access to data will be restricted by user (employee) id and job function.

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

- Yes
 No

23.2. Are procedures in place to detect or deter 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 – Security controls are discussed in the System Security Plan
 No

CUSTOMER PROTECTION

25. Who will be responsible for protecting the privacy rights of the citizens and employees affected by the interface (i.e. office, person, departmental position, etc.)?

The System/Application Owner

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

Citizens and employees may contact the Freedom of Information Officer:

Dorothy Hinden
Freedom of Information Officer
Rural Development, USDA
7th Floor, Reporter's Bldg.
Washington, DC 20250
Dorothy.Hinden@wdc.usda.gov
(202)692-0031

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, where is the breach notification policy located?

- U.S. Department of Agriculture Incident Notification Plan September 2007

- DM3505-001 USDA Computer Incident Response Procedures Manual.

- Computer Incident Response Standard Operating Procedures (CIRT)

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 citizens and employees of fundamental rules of fairness (those protections found in the Bill of Rights)?

- 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 citizens and employees?

DM 3515-002, section e states:

To fulfill the commitment of the USDA to protect customer and employee data, several issues must be addressed with respect to privacy:

- 1 The use of information must be controlled; and
- 2 Information may be used only for a necessary and lawful purpose.

Where Public Affairs systems of records are involved:

- 1 Individuals must be informed in writing of the principal purpose and routine uses of the information being collected from them;

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2 Information collected for a particular purpose should not be used for another purpose without the subject's consent unless such other uses are specifically authorized or mandated by law; and
3 Any information used must be sufficiently accurate, relevant, timely, and complete to assure fair treatment of the individual.

Also, P.L. 95-454, the Civil Service Reform Act of 1978 which is enforced by The U.S. Equal Employment Opportunity Commission (EEOC) ensures the equitable treatment of the employees.

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

- Yes
 No. See Above.

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

Data cannot be retrieved on an identifying attribute alone. Specific information, such as general ledger journal, date of transaction, journal code, etc., would have to be used in conjunction with identifying attribute in order to retrieve the data.. This information is not available to the typical user.

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

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)

USDA/RURAL DEVELOPMENT-1

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

Modifications to the system will be recorded as part of the Configuration Management process and major revisions will be reflected in updates of the Certification and Accreditation documentation and, if deemed necessary, will trigger re-accreditation of the system.
Rural Development's SDLC and CM process requires the ISSS to review system changes for security documentation updates and re-accreditation decisions impact to ensure that the system SORN is revised as needed.

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TECHNOLOGY

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

- Yes
 No. There are no new technologies introduced by PFCS.

32.1. How does the use of this technology affect citizens and employees privacy?
Non Applicable

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**

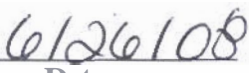
I have ~~carefully~~ assessed the Privacy Impact Assessment for the PFCS System

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



Date



Brenda Dinges - Agency's Chief FOIA Officer



Date



Agency OCIO



Date