



UNITED STATES DEPARTMENT OF  
**AGRICULTURE**

**FARM SERVICE AGENCY**

**Privacy Impact Analysis (PIA)  
for  
Program Loan Accounting System  
(PLAS)**

**FINAL**

**Update Date: August 19, 2007**

**Accreditation Date:**



**Farm Service Agency  
ITSD/ADC/FCAO/LMRG  
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**Document Control**

Date	Source	Author	Description of Changes
06/12/2006	EDS	D Stanley	Consolidation to accommodate new systems
06/22/2006	FSA/FCAO	Judy Cain	Reworded System Overview and removed reference to SALA, added systems under 5a
06/05/2007	J Wagner, EDS	J Wagner, EDS	Changed SORN to fix missing "FSA" as part of the identification. Question regarding a change to the SORN was answered "No." Changed to possibly if data, record storage location or routine use changes. Changed update date on cover and header. Changed location in header from KC to STL.
08/07/2007	OCIO Template	J Wagner, EDS	Added signature page
08/15/2007		Brian Davies, ISO	Made minor syntax changes
08/16/2007		Judy Cain	Made minor changes to Table 2, 2f and Table 3, 5a and 6a
08/17/2007		Phil Haman	Added agency access information to Table 3.
08/18/2007	3-INFO	E. Miller, ISO	Verify SOR Notice
08/19/2007	ISO	E. Miller, ISO	Final ISO C&A Review, Insert faxed 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 the Program Loan Accounting System 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
Program Loan Accounting System (PLAS)

## 2.2 System Overview

- **PLAS** – The Program Loan Accounting System supports Farm Service Agency (FSA) and Rural Development (RD) on more than 30 different direct and guaranteed loan types plus various grant programs. PLAS also includes interfaces from multi-family housing, single family housing, and rural utilities in its financial and reporting processes. PLAS processes more than 10 million transactions annually including 3.5 million loan payments.

## 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.	PLAS uses customer Name, SSN, address, loan information, census type data and bank information.
2a. What are the sources of the information in the system?	PLAS uses information from the customer, the State and County Office and SCOAP.
2b. What USDA files and databases are used? What is the source agency?	PLAS uses SCOAP – DAR\$\$ – SCIMS, NFC Type 60, GLS, DLOS, PFCS.
2c. What Federal Agencies are providing data for use in the system?	Farm Service Agency (FSA) Rural Development (RD) Treasury, NFC, HUD Credit Checks, DOJ
2d. What State and Local Agencies are providing data for use in the system?	N/A
2e. From what other third party sources will data be collected?	LOCBOX
2f. What information will be collected from the customer/employee?	Customer name, SSN, personal information, loan information, census type data and financial information
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Standard Accounting Practice of Balancing, GAO Audit, FOI
3b. How will data be checked for completeness?	Edit validations.

**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)?	Users, managers, System Administrators, developers.

ACCESS TO THE DATA	
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	System security restrictions and exercise of physical security. Web access - eAuth / EAS Established roles for given eAuth accounts are passed in the HTTP Header and validated by the individual application to determine level of access. Yes, criteria, procedures, controls, and responsibilities regarding access are documented.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	Access is managed through role based security restrictions for PLAS. Users of this web site will NOT have access to other data in the system unless otherwise authorized.
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Banner is the first line of defense. System access is issued on a need to know only basis. Employee security awareness training informs users of their responsibilities with regard to safeguarding privacy information.
5a. Do other systems share data or have access to data in this system? If yes, explain.	Yes – PFCS, MAC, DLOS, GLS, FLRA, NFC, SCIMS, DLS
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	System owners and all authorized personnel who have been granted access to the system.
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	FSA Federal, State and County Field Offices, Rural Development, IRS, NFC, HUD, NRCS, OGC, DOJ, and Treasury
6b. How will the data be used by the agency?	As per MOU's
6c. Who is responsible for assuring proper use of the data?	WDC FLP Program Staff , Program Accounting managers from FSA, and RD are responsible for assuring proper use of system data.

**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.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	Yes

ATTRIBUTES OF THE DATA	
2b. Will the new data be placed in the individual's record (customer or employee)?	Yes
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	Yes
2d. How will the new data be verified for relevance and accuracy?	Through standard financial accounting practices of balancing.
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	Access is managed through role based security restrictions.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Yes – access is managed through role based security restrictions.
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Online queries and batch processing. Yes – name, SSN, address, loan information, census type data, bank information.
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.	Everyone uses the same system. Program regulations ensure equitable treatment of customers.
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?	All programs and data are referenced from a central application, and database server.
2b. Explain any possibility of disparate treatment of individuals or groups.	N/A
2c. What are the retention periods of data in this system?	Indefinite

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?	Consult Handbook 25-AF
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?	Policy guidance provided by 6-IRM applies.
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.	No
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?	N/A
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	<ul style="list-style-type: none"> <li>• Farm Records File (Automated), USDA/FSA-2</li> <li>• Applicant/Borrower, USDA/FSA-14</li> </ul>
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

Program Loan Accounting System (PLAS)  
(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.

*Terry Tanner*

*8-16-07*

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

Agency CIO

Date