



UNITED STATES DEPARTMENT OF
AGRICULTURE

FARM SERVICE AGENCY

Privacy Impact Analysis (PIA)
for
**Tobacco Transition
Payment Program
(TTPP)**

FINAL

Update Date: August 19, 2007

Accreditation Date:



**Farm Service Agency
ITSD/ADC/PSCAO/SFG
6501 Beacon Drive
Kansas City, MO 64133**

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Document Control

Date	Source	Author	Description of Changes
04/13/2005		Peg Whitmore	Original document.
05/30/2005		EDS	Modified formatting
01/11/2006		STG	Reviewed
05/31/2006	EDS	Jeff Wagner, EDS	Updated to 2006 template;
06/12/2006	Norma Ferguson	Jeff Wagner, EDS	SOR = USDA/FSA-2
06/05/2007	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
08/17/2007		Jack Meis	Updated for more accurate information to include other systems TTPP accesses.
08/19/2007	ISO	E. Miller, ISO	Final C&A Review, Insert faxed signature

Prepared for:
 Certification & Accreditation Phase 1
 Farm Service Agency
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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 Tobacco Transition Payment Program 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
Tobacco Transition Payment Program (TTPP)	Not Applicable

2.2 System Overview

The Tobacco Transition Payment Program (TTPP) is mandated by Public Law # 108-357, signed by the President on October 22, 2004, the American Jobs Creation Act of 2004. This program will end all of USDA's aspects of the federal tobacco marketing quota and price support loan programs on the System 36 and the mainframe. Under this legislation, payments are to be made to tobacco quota holders and producers to help them change to producing other crops. This will be a 10 year program, with the last payment being made in 2014. There will be 670,000+ tobacco quota holder and producer contracts, and the payments will total somewhere between 9.6 and 10.14 billion dollars.

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.	Customer: The customer will receive a contract and a confirmation form with the number of pounds to be paid and the dollar amount per pound. Employee: The employee will use farm data and base quota level data to create the contract for the customer.
2a. What are the sources of the information in the system?	The data to load the SQL data base came from the upload of the county files (CAD/NASS tapes). The requirements in the User Requirements were applied before the database was loaded.
2b. What USDA files and databases are used? What is the source agency?	FSA TTPP SQL database, SCIMS, NPS, Subsidiary Eligibility, AGI, MRT
2c. What Federal Agencies are providing data for use in the system?	USDA/FSA only
2d. What State and Local Agencies are providing data for use in the system?	FSA County Service Centers
2e. From what other third party sources will data be collected?	Copies of Land deeds, estate documents and other agreements will be collected and filed as paper copies.
2f. What information will be collected from the customer/employee?	The customer and the employee will validate the data provided on the database and make changes as required.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Land deeds and other agreements will be checked by the county tax office, etc.
3b. How will data be checked for completeness?	Data will be verified against S/36 reports and queries.

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)?	County Office Users, System Administrators, Managers, National Tobacco Processing Center (NTPC) representatives, developers
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	By using FSA's standard security with logins verified through eAuth and EAS.

ACCESS TO THE DATA	
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	Access is restricted based on county. Must have administrator rights to change passwords, etc. NTPC, State and National users will have read only access to reports.
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Both eAuth and EAS are used for authentication and role-based authorization.
5a. Do other systems share data or have access to data in this system? If yes, explain.	TTPP accesses SCIMS, NPS, MRT, AGI and Subsidiary Eligibility. No other systems access TTPP data.
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	John Truluck, as DAA for TTPP, holds responsibility for privacy rights protection.
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	No
6b. How will the data be used by the agency?	N/A
6c. Who is responsible for assuring proper use of the data?	N/A

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, only required data was captured: tax payer id, id type, farm number, tract number, base quota level (BQL).
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	Yes. The payment amount will be calculated by multiplying the BQL by \$7 per pound for quota holders and \$1 per pound for each of 3 years (2002, 2003, and 2004) of production for producers.
2b. Will the new data be placed in the individual's record (customer or employee)?	Yes, for 1099 reporting
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	No
2d. How will the new data be verified for relevance and accuracy?	Cross checks to S/36 reports and hardcopy records.
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	Both eAuth and EAS for authentication and role-based authorization.

ATTRIBUTES OF THE DATA	
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Yes - Changing passwords, new passwords, call back features of routers to associations, password verifications, system monitoring
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	The user must login with ID and password to access data. Yes, data can be displayed and/or modified by farm serial number, tax payer id or contract number.
4b. What are the potential effects on the due process rights of customers and employees of: <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. 	None
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.	The checks for equitable treatment are all manual.
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?	The software and the database are centrally located; accessible via the web. Notices will be used to inform the counties of proper usage.
2b. Explain any possibility of disparate treatment of individuals or groups.	The only possibility of disparate treatment of individuals or groups will be from human intervention
2c. What are the retention periods of data in this system?	At least fifteen years.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Standard procedures are used, as documented in various handbooks, such as the FSA 25-AS
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?	There are checks and balances in the system for any one farm's records. Third party reviews were completed on all contracts in the county offices before any were paid.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
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.	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

Tobacco Transition Payment Program (TTPP)
(System Name)

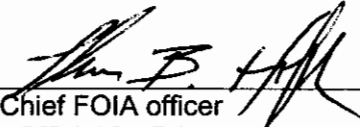
This document has been completed in accordance with the requirements of the EGovernment Act of 2002.

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

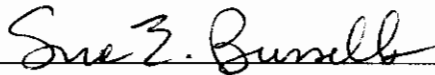
Aug 16, 2007
Date



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

8/28/07
Date

 Agency CIO



8/30/07
Date