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Information System Security Staff

Privacy Impact Assessment

Program Fund Control System

Version 1.0

June 2007

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Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the Program Fund Control System. This document has been completed in accordance with the requirements of the E-Government Act of 2002.


MANAGEMENT CERTIFICATION – Please check the appropriate statement.

The document is accepted.

The document is accepted pending the changes noted.

The document is not accepted.

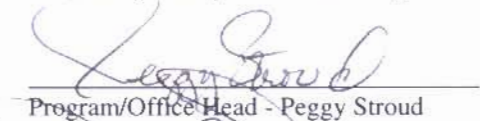
_____ We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.


System Manager - Janet Havelka

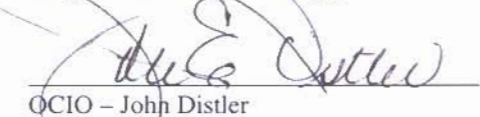
May 30, 2007
DATE


OCIO/Project Representative – Eugene Texter

5-30-07
DATE


Program/Office Head - Peggy Stroud

6/6/07
DATE


OCIO – John Distler

6/6/07
DATE


Chief FOI/PA – Brenda Dinges

6/13/07
DATE


Senior Official for Privacy – Christopher L. Smith

6/6/07
DATE

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Name of Project: Program Fund Control System
Program Office: Rural Development
Project's Unique ID: 005-55-01-01-01-1060-00-402-127

Information System Name/Title	Program Fund Control System
System Acronym	PFCS
System of Records (SOR)	USDA / RD-SOR-1
System Type	<input type="checkbox"/> GSS <input checked="" type="checkbox"/> MA <input type="checkbox"/> GSS sub-system <input type="checkbox"/> MA individual application
Responsible Organization	USDA – Rural Development

A. CONTACT INFORMATION

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7. Who is the Reviewing Official? (According to OMB, this is the agency CIO or other agency head designee, who is other than the official procuring the system or the official who conducts the PIA).

Name	Christopher L. Smith
Title	Rural Development CIO
Address	300 7th ST SW Washington DC 20024
Email address	ChristopherL.Smith@wdc.usda.gov
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B. SYSTEM APPLICATION/GENERAL INFORMATION

The Farm Service Agency (FSA) and Rural Development replaced their legacy system funds control processes with the Oracle Federal Financials commercial off the shelf (COTS) software package, Program Funds Control System (PFCS) that 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 Rural Development 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 the files are updated 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.

PFCS interfaces with the following legacy systems/processes, all of which reside at the NITC in Kansas City, Mo. and Rural Development Web Farm in St. Louis, Mo.; none of these systems are external systems (interconnection/information sharing); all legacy system connections with PFCS for file transfer connections are made and then dropped:

- Program Loan Accounting System (PLAS) - Owned by FSA, supported and shared usage by RD
- DLOS-MortgageServ, a subsystem of the Consumer system and owned by RD
- Guaranteed (Formerly Guaranteed Loan System “GLS”) - Owned by RD, shared usage by FSA
- Standard General Ledger System (SGL) - Owned by FSA, supported and shared usage by RD
- Commercial (Formerly Rural Utilities Loan Servicing System “RULSS”) –Owned by RD

Data is received from and passed to all the above systems except the Standard General Ledger, which only receives data from PFCS.

PLAS, MortgageServ, and GLS use “MQ” series to pass predetermined data fields to PFCS, to determine funds availability. PFCS checks for funds availability using various identifying elements to ensure authorization against the appropriate funds category. If funds are available, records will be updated, the approval will be returned from PFCS to the requesting system, and available funds will be reduced by the amount of the approval just authorized. RULSS operates in a similar manner to that just described for PLAS, MortgageServ, and GLS. PFCS, as well as the legacy systems with which it interfaces described above, sends records to the SGL for updating all appropriate general ledger accounts.

PFCS interconnects with PLAS and the SGL, both owned and operated by FSA.

1. Does this system contain any information about individuals?	Yes.
(a) Is this information identifiable to the individual?	Yes. Transactions passed from the Program Loan Accounting System (PLAS) and the Guarantee Loan System (GLS) may contain social security numbers.
(b) Is the information about individual members of the public?	Yes.
(c) Is the information about employees?	Yes
2. What is the purpose of the system/application?	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.
3. What legal authority authorizes the	Title V, Housing Act of 1949, As Amended through the

purchase or development of this system/application?	American Homeownership and Economic Opportunity Act of 2000, Pub.L. 105 569 (Dec. 27, 2000)
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C. DATA in the SYSTEM

1. Generally describe the type of information to be used in the system and what categories of individuals are covered 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.
2. What are the sources of the information 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).
(a). Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?	Allotments, program distribution, and state allocations are entered manually by appropriate FSA and Rural Development employees. Obligations and disbursements are stored but sourced from the loan and grant system interfaces (PLAS, MortgageServ, RULSS, and GLS).
(b). What Federal Agencies 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.
(c). What State and Local Agencies are providing data for use in the system?	No state and local agencies provide data.
(d). From what other third party sources will data be collected?	No third party sources provide data.
(e). What information will be collected from the customer/employee?	The data is from FSA, GLS, MortgageServ, RULSS, and PLAS systems passed to PFCS. The transaction 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.
3. Accuracy, Timeliness, and Reliability	
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Only data from USDA records is used in PFCS. OMB provides the approved apportionments by Treasury Symbol.

<p>3b. How will data be checked for completeness?</p>	<p>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.</p>
<p>3c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).</p>	<p>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.</p>
<p>3d. Are the data elements described in detail and documented? If yes, what is the name of the document?</p>	<p>Yes. The PFCS Configuration Document.</p>

D. ATTRIBUTES OF THE DATA

<p>1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?</p>	<p>Yes. Funds control is required by law to prevent “anti-deficiency”, spending more money than is appropriated by Congress.</p>
<p>2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?</p>	<p>This system does not derive or create any new available data about individuals. No individual or employee data is aggregated from the feeder systems.</p>
<p>3. Will the new data be placed in the individual’s record (customer or employee)?</p>	<p>Not Applicable.</p>
<p>4. Can the system make determinations about customers or employees that would not be possible without the new data?</p>	<p>No decisions are made in PFCS concerning customer or employees.</p>
<p>5. How will the new data be verified for relevance and accuracy?</p>	<p>Not Applicable.</p>
<p>6. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?</p>	<p>Not applicable.</p>
<p>7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.</p>	<p>Not Applicable. No processes are consolidated.</p>
<p>8. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.</p>	<p>Some limited retrieval of transaction data by borrower id will be conducted to research out-of-balance conditions.</p>

<p>9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?</p>	<p>Numerous reports are available in PFCS. The reports are used to reconcile funds allocated and obligated. FSA, GLS, MortgageServ, RULSS, and PLAS users with authorized access to the PFCS have access to the reports.</p>
<p>10. What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses and how individuals can grant consent.)</p>	<p>No information is provided directly by the individuals to PFCS. Information is received from the program area accounting systems. Only information necessary for obligating, auditing, and reconciling funds are gathered from the accounting systems.</p>

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS

<p>1. If the system is operated in more than one site, how will consistent use of the system and data will be maintained in all sites?</p>	<p>PFCS is only operated at one site.</p>
<p>2. What are the retention periods of data in this system?</p>	<p>FSA recently issued regulations that data must be kept indefinitely. To date, PFCS has not archived any data.</p>
<p>3. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?</p>	<p>FSA recently issued regulations that data must be kept indefinitely.</p>
<p>4. Is the system using technologies in ways that the USDA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?</p>	<p>There are no new technologies introduced by PFCS.</p>
<p>5. How does the use of this technology affect public/employee privacy?</p>	<p>There is no technology impact to affect customer/employee privacy.</p>
<p>6. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.</p>	<p>Audit trails are maintained in the database to allow tracking of updates by employees.</p>
<p>7. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>Employee name, responsibility, agency, id, logon start date, logon end date, organization, and last login date. There is no data collected for borrowers.</p>
<p>8. What controls will be used to prevent unauthorized monitoring?</p>	<p>Audit logs for PFCS are accessible by the Information Systems Security Staff of FSA and Rural Development. PFCS controls prevent either agency from accessing any records, reports, or data from the other agency. Likewise, the users of one application (FSA, RULSS, GLS, MortgageServ, and PLAS) are systematically restricted from accessing data from the</p>

	other applications.
9. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	PFCS operates under SOR notice USDA/Rural Development-1.
10. If the system is being modified, will the SOR require amendment or revision? Explain.	Rural Development's Systems Development Life Cycle and Configuration Management processes require the ISSS to review system changes for security documentation updates and re-accreditation decisions impact to ensure that the System of Record Notices are revised as needed.

F. ACCESS TO THE DATA

1. Who will have access to the data in the system (E.g., contractors, users, managers, system administrators, developers, tribes, other)?	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.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	<p>Access is controlled by user id and password. Access rights are granted to designated individuals only when their supervisor approves a written request.</p> <p>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) assigns group membership and determines need-to-know validation. The POC is responsible for verifying user identification; the User Access Management Team (UAMT) relies 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.</p> <p>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</p>

	established access.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	User access to data will be restricted by user (employee) id and job function.
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Access is limited by user id. There is an audit trail of any updates to the data. USDA employees are provided with a warning message when entering PFCS and are bound by USDA rules and regulations.
5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, are Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?	PFCS was developed and is maintained by contractors. Yes, Contractor Statements of Work contain Privacy Act clauses and other regulatory measures.
6. Do other systems share data or have access to data in this system? If yes, explain.	FSA and Rural Development Budget staff enter appropriations, allocations, and program budget information. FSA, GLS, MortgageServ, RULSS, and PLAS systems interface to PFCS for obligating funds for their loan and grant programs.
7. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface?	Janet Havelka Chief, Mortgage Loan Technologies Branch 314-335-8655
8. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	Government oversight agencies such as OMB, GAO, OCIO-CS, OCFO, FSA, and OIG may be granted limited access for oversight and auditing purposes.
9. How will the data be used by the 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.
10. Who is responsible for assuring proper use of the data?	The Financial Officers and Program Staffs assure proper use of the data. OIG, OMB, OCIO-CS, OCFO, FSA, and GAO provide oversight within their respective agencies.

APPENDIX A

DECLARATION OF PRIVACY PRINCIPLES

The privacy principles set forth in this declaration are based on the ethical and legal obligations of the United States Department of Agriculture to the public and are the responsibility of all USDA employees to recognize and treat their office as a public trust.

The obligation to protect client and partner privacy and to safeguard the information clients and partners entrust to us is a fundamental part of the USDA's mission to administer the law fairly and efficiently. Clients and partners have the right to expect that the information they provide will be safeguarded and used only in accordance with law. In recognition of these obligations, policies and procedures must clearly state who should have access to what information and for what purposes. In addition, appropriate limitations must be placed on the collection, use and dissemination of clients and partners' personal and financial information and sufficient technological and administrative measures must be implemented to ensure the security of USDA data systems, processes and facilities.

All USDA employees are required to exhibit individual performance that reflects a commitment to dealing with every client and partner fairly and honestly and to respect the clients and partners' right to feel secure that their personal information is protected. To promote and maintain clients and partners' confidence in the privacy, confidentiality and security protections provided by the USDA, the USDA will be guided by the following Privacy Principles:

Principle 1:	Protecting citizen, client and partner privacy and safeguarding confidential citizen, client and partner information is a public trust.
Principle 2:	No information will be collected or used with respect to citizens, clients and partners that is not necessary and relevant for legally mandated or authorized purposes.
Principle 3:	Information will be collected, to the greatest extent practicable, directly from the citizen, client or partner to whom it relates.
Principle 4:	Information about citizens, clients and partners collected from third parties will be verified to the greatest extent practicable with the citizens, clients and partners themselves before action is taken against them.
Principle 5:	Personally identifiable citizen, client or partner information will be used only for the purpose for which it was collected, unless other uses are specifically authorized or mandated by law.
Principle 6:	Personally identifiable citizen, client or partner information will be disposed of at the end of the retention period required by law or regulation.
Principle 7:	Citizen, client or partner information will be kept confidential and will not be discussed with, nor disclosed to, any person within or outside the USDA other than as authorized by law and in the performance of official duties.
Principle 8:	Browsing, or any unauthorized access of citizen, client or partner information by

	any USDA employee, constitutes a serious breach of the confidentiality of that information and will not be tolerated.
Principle 9:	Requirements governing the accuracy, reliability, completeness, and timeliness of citizen, client or partner information will be such as to ensure fair treatment of all clients and partners.
Principle 10:	The privacy rights of citizens, clients and partners will be respected at all times and every citizen, client and partner will be treated honestly, fairly, and respectfully.

The Declaration does not, in itself, create any legal rights for clients and partners, but it is intended to express the full and sincere commitment of the USDA and its employees to the laws which protect client and partner privacy rights and which provide redress for violations of those rights.

APPENDIX B

POLICY STATEMENT ON CITIZEN, CLIENT AND PARTNER PRIVACY RIGHTS

The USDA is fully committed to protecting the privacy rights of all citizens, clients and partners. Many of these rights are stated in law. However, the USDA recognizes that compliance with legal requirements alone is not enough. The USDA also recognizes its social responsibility, which is implicit in the ethical relationship between the USDA and the citizen, client or partner. The components of this ethical relationship are honesty, integrity, fairness, and respect.

Among the most basic of a citizens, clients, or partners' privacy rights is an expectation that the USDA will keep personal and financial information confidential. Citizens, clients and partners also have the right to expect that the USDA will collect, maintain, use, and disseminate personally identifiable information and data only as authorized by law and as necessary to carry out agency responsibilities.

The USDA will safeguard the integrity and availability of citizens, clients and partners' personal and financial data and maintain fair information and record keeping practices to ensure equitable treatment of all citizens, clients and partners. USDA employees will perform their duties in a manner that will recognize and enhance individuals' rights of privacy and will ensure that their activities are consistent with law, regulations, and good administrative practice. In our record keeping practices, the USDA will respect the individual's exercise of his/her First Amendment rights in accordance with law.

As an advocate for privacy rights, the USDA takes very seriously its social responsibility to citizens, clients and partners to limit and control information usage as well as to protect public and official access. In light of this responsibility, the USDA is equally concerned with the ethical treatment of citizens, clients and partners as well as their legal and administrative rights.