

**USDA PRIVACY IMPACT ASSESSMENT FORM**

**Agency:** USDA, Food, Nutrition and Consumer Service

**System Name:** Integrated Program Accounting System (IPAS)

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

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

**Description of the System:**

IPAS is the system that accounts for FNCS programs that provides support for the following functions related to financial management and accounting:

- Collect accurate, timely, complete, reliable, and consistent information; provide for adequate agency management reporting;
- Support government-wide, departmental, and agency level policy decisions;
- Support the preparation and execution of agency budgets;
- Facilitate the preparation of financial statements, and other financial reports in accordance with Federal accounting and reporting standards;
- Provide information to central agencies for budgeting, analysis, and government-wide reporting, including consolidated financial statements; and
- Provide a complete audit trail to facilitate audits.

**Who owns this system? (Name, agency, contact information)**

USDA, FNS  
Rose B. McClyde, Director Accounting Division  
3101 Park Center Drive, Rm 724  
Alexandria, Va 22302  
703 305-2447

**Who is the security contact for this system? (Name, agency, contact information)**

USDA, FNS, ITD  
Shawn Jones  
3101 Park Center Drive, Rm 317  
Alexandria, VA 22302  
703 205-2528

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**Who completed this document?** (Name, agency, contact information)

**USDA, FNS  
Rose B. McClyde, Director, Accounting Division  
3101 Park Center Drive  
Rm 724  
Alexandria, Va 22302  
703 305-2447**

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

Indicate whether the following types of personal data are present in the system

<b>QUESTION 1</b>	Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:		
Name	YES	NO
Social Security Number	YES	NO
Telephone Number	YES	NO
Email address	YES	NO
Street address	YES	NO
Financial data	YES	NO
Health data	NO	NO
Biometric data	NO	NO
<b>QUESTION 2</b>	NO	NO
Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.?		
NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code <sup>1</sup>		
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.)?	YES	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:

**3. 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.

<sup>1</sup> 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.

Name, Address, Social Security or Tax Identification Number, telephone number, email address

The data is used for collection of agency debts and agency payments through Treasury systems.

4. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.

Yes

5. Sources of the data in the system.

5.1. What data is being collected from the customer?

Name, address, SSN, telephone #, TIN, email address, banking information.

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

None

5.3. What state and local agencies are providing data for use in the system?

None

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

Department of Justice

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

Yes

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

The data is validated against the STARS database.

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

N/A

6.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?

The data is compared to the STARS database

## 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?

Collection of debt and payment for refunds

8. Will the data be used for any other purpose?

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 designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President

Yes

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.)?

No. If NO, go to question

11

10.1. Will the new data be placed in the individual's record (customer or employee)?

Yes

No

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10.2. Can the system make determinations about customers or employees that would not be possible without the new data?

Yes  
No

10.3. How will the new data be verified for relevance and accuracy?

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?

For collections and payments

12. Will the data be used for any other uses (routine or otherwise)?

No. If NO, go to question

13

12.1. What are the other uses?

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?

No. If NO, go to question

14

13.1. What controls are in place to protect the data and prevent unauthorized access?

14. Are processes being consolidated?

No. If NO, go to question

15

- 14.1. What controls are in place to protect the data and prevent unauthorized access?

## DATA RETENTION

15. Is the data periodically purged from the system?

No. If NO, go to question

16

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

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

- 15.3. Where are these procedures documented?

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?

Data is reconciled and audited annually

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

Yes

## 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

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

Data is used by Treasury to make payments and for tax reporting purposes

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

Deputy Administrator for Financial Management

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

Yes

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?

Yes

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

No. If NO, go to question

21

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

## DATA ACCESS

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

Users, managers, and system administrators will have access to the data.

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

User access is determined by supervisors based on duties and functional responsibilities.

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

Yes

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

User access to data is restricted through the user of user class codes to establish system security



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

Yes

24. Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

Yes

## CUSTOMER PROTECTION

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

Deputy Administrator for Financial Management

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

Telephone call or email

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?

No

27.1. If NO, please enter the POAM number with the estimated completion date:

N/A

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 a customer of due process rights (fundamental rules of fairness)?

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 customers?

Supervisory review of all actions taken.

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

No. If NO, go to question

31

30.1. Explain

## 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

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

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](http://www.access.GPO.gov))

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

N/A

## TECHNOLOGY

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

No. If NO, the questionnaire is complete.

32.1. How does the use of this technology affect customer privacy?

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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

## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Integrated Program Accounting System (IPA)  
(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.

Rose B. McClyde Rose B. McClyde  
System Manager/Owner  
OR Project Representative  
OR Program/Office Head.

Date 6/22/07

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

6/27/07  
Date

[Signature]  
Agency OCIO

6/28/07  
Date