USDA UNITED STATES DEPARTMENT OF AGRICULTURE

FARM SERVICE AGENCY

Privacy Impact Analysis (PIA)
for
Price Support Systems
(PSS)

- Cooperative Marketing Association System (CMA)
- Price Support Systems Market and Assistance Loans
- Price Support
- Facility Loans
- Market Loss

DRAFT

Update Date: August 18, 2007

Accreditation Date:

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Document Control

Date	Source	Author	Description of Changes
			Original document.
02/01/2007	Template	Sarita Gupta, EDS	Transcribed to new 2007 template
02/2007		David Goodman	PSS update for PSS Market and Assistance Loans
02/22/2007		Paul Luke	PSS update EWR
02/23/2007		Jack Meis	PSS update MILC-X
02/23/2007		Dave Murphy	PSS CMA update
02/23/2007		John McKeon	PSS TAA update
02/26/2007		Jack Meis	Facility Loans update
			System Owner Approved
03/25/2007	Chris Hoover, EDS	Chris Hoover, EDS	Phase 1 SME Approved
04/06/2007	Eric Miller, ISO	Eric Miller, ISO	ISO Approval
06/06/2007	J Wagner, EDS	J Wagner, EDS	Question regarding a change to the SORN was answered "N/A" or "Undetermined." 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
08/09/2007		David Goodman	PSS eLDP update related to Compliance web service.
08/18/2007	ISO	E. Miller, ISO	Final C&A Review

Prepared for:
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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 PSS 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

Price Support Systems (PSS)	• **Cooperative Marketing Association System (CMA)**
	• **Price Support Systems Market and Assistance Loans**
	• **Price Support**
	   o Electronic Loan Deficiency Payments (ELDP)-Web
	   o State Online Reporting System (SORS)
	   o Electronic Warehouse Receipts (EWR) (Rice)
	• **Facility Loans**
	   o Farm Storage Facility Loans (FSFL)
	   o Sugar Storage Facility Loans (SFSL)
	• **Market Loss**
	   o MILC-X
	   o Trade Adjustment Assistance (TAA)

2.2 System Overview

2.2.1 Cooperative Marketing Association System (CMA)

The FSA Cooperative Marketing Association System (CMA) is a National Computer System that is designed, maintained and operated to allow marketing cooperatives the ability to provide Cooperative Marketing Associations (CMAs) and Loan Servicing Agents (LSAs) timely and accurate eligibility, farm record and payment limitation data in order to determine producer eligibility for obtaining marketing assistance loans, loans and loan deficiency payments (LDP) through CMA's, LSAs and DMAs.

2.2.2 Price Support Systems Market and Assistance Loans

The Market and Assistance Loans automated price support system collects information associated with a producer's personal information and loan collateral (commodity).

Market loan repayment provisions specify, under certain circumstances, that producers may repay loans at less than principal plus accrued interest and other charges. Alternatively, loan deficiency payment (LDP) provisions specify that, in lieu of securing a loan, producers may be eligible for an LDP. For ELS cotton, LDP provisions do not apply and ELS cotton marketing assistance loans must be repaid at the loan rate plus interest.

2.2.3 Price Support

2.2.3.1 Electronic Loan Deficiency Payments (ELDP)-Web

The Electronic Loan Deficiency Payment system is the first e-government system sponsored by the Farm Service Agency. Through this web-based system, eligible producers can request loan deficiency payments via the World Wide Web 24 hours a day, seven days per week. The user interface to the system is hosted on Web Sphere Application Servers. The data is hosted on SQL Server databases residing at KC-ITSDO.

The eLDP application interfaces with Accounting (NPS), Production Adjustment (AGI and Eligibility), Compliance, Producer Name and Address (SCIMS), Role based Representation (eRep), and the Cotton Online Processing System (COPS). The system provides for tracking and reporting of automated farm-stored and warehouse-stored eLDPs issued to entities and producers as an alternative to Loans for Market Price commodities.

State and County Service Center Agency personnel access the eLDP application using OCIO-ITS CCE GSS workstations and the Department standard eAuthentication authorization solution. S/36 dependent payment limitation data and market gain reporting data is transmitted from the web farm to the County Office AS/400 on demand. eLDP resides on the OCIO-ITS Webfarm GSS located at the National Information Technology Center (OCIO-NITC).

2.2.3.2 State Online Reporting System (SORS)

Summary, detail, and history information from legacy Price Support files are partially replicated from VSAM datasets on the OCIO-NITC mainframe to a Sybase database also maintained by OCIO-NITC and used by the SORS Internet and Intranet State Office Reporting Systems.

2.2.3.3 Electronic Warehouse Receipts (EWR) (Rice)

7 CFR, Part 375, Regulations for the United States Warehouse Act (Act) provides that warehouse operators may issue an electronic warehouse receipt (EWR) for the agricultural product stored in their warehouse. The Farm Service Agency (FSA), under the general direction of the Deputy Administrator, Commodity Operations (DACO), has authorized the development of a Beta System for a Web-based centralized Electronic Warehouse Receipt system for rice.

The system shall provide the USDA Service Center the ability to access EWRs from a central EWR repository for price support purposes. The centralized FSA EWR System shall be the repository of EWRs for agricultural commodities requesting price support benefits. The system will interact with a Provider system (this system handles receipts between producers and the warehouse) and the FSA Service Centers in order to access and use EWRs to administer price support programs.

The centralized FSA EWR System shall be operational to handle EWRs for rice loan and LDP activities starting crop year 2005. In the future, the system shall be expanded to handle other EWRs for commodities eligible for price support loan and LDP.

2.2.4 Facility Loans

2.2.4.1 Farm Storage Facility Loans (FSFL)

The Farm Storage Facility Loans (FSFL) program provides loans to producers of certain crops to renovate or build storage and handling facilities. The FSFL mainframe system will track key application information, including State and County Code, application number, applicant/borrower ID, application date, facility type, and application amount. For the application statuses (Approval, Disapproval, Withdrawal or Deletion), the key elements are date of action and the approved application amount,

when applicable. The FSFL disbursement records will monitor disbursement dates and amounts against appropriated funding.

2.2.4.2 Sugar Storage Facility Loans (SFSL)

Section 1402 of the Farm Security and Rural Investment Act of 2002 authorized sugar farm stored facility loans. A new system was developed to manage and monitor FSFLs.

The mainframe system will track key application information: State and County Code, application number, applicant/borrower ID, application date, facility type, and application amount. For the application statuses (Approval, Disapproval, Withdrawal or Deletion), the key elements are date of the applicable action and the approved application amount, when applicable. The FSFL disbursement records will monitor disbursement date and the disbursement amount against appropriated funding.

2.2.5 Market Loss

2.2.5.1 MILC-X

Milk Income Loss Contract Extension (MILC-X), FSA's Milk Income Loss Contract Extension (MILC-X) Program, financially compensates dairy producers when domestic milk prices fall below $16.94 per hundredweight. The program is available for fiscal years 2006-2007, and eligible producers can apply for program benefits anytime between March 13, 2006, and September 30, 2007.

2.2.5.2 Trade Adjustment Assistance (TAA)

Trade Adjustment Assistance (TAA) Under the Trade Adjustment Assistance (TAA) for Farmers Program, the U.S. Department of Agriculture helps producers of agricultural commodities adjust to competition from imports by providing them technical assistance, cash payments and opportunities for job retraining. TAA provides eligible producers a cash payment based on a formula, which provides partial compensation to producers for the decline in market prices below the 80 percent threshold required for TAA petition approval. The payment rate initially announced may be reduced based on the total number of commodities and producers approved for payment. This may be necessary because TAA funding is limited to $90 million for each fiscal year. The maximum amount a producer can receive in any Federal fiscal year under TAA is $10,000. This program is operational.

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.	**Cooperative Marketing Association System (CMA):**
	SS #s, Tax ID #s, Farm #s
	Price Support Systems Market and Assistance Loans:
	Social Security #, Tax ID, Farm, Address, Payment Information, Producer Farm Data, Repayment information, PS Benefits
	Price Support
	    Electronic Loan Deficiency Payments (eLDP)-Web:
	    Social Security/Tax ID Number, name, address, entity type.
	    Cotton receipt data, acreage/production data, AGI/Permitted Entity and Eligibility data.
	
	    State Online Reporting System (SORS):
	    Social Security/Tax ID Number, name, address, entity type
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    Warehouse Receipt information between producer and Provider service, Price Support Benefits
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    Customer – farm records and ID numbers.
	
	    Sugar Storage Facility Loans (SFSL):
	    Customer – farm records and ID numbers.
	
	Market Loss
	    MILC-X :
	    Customer – SS#/Tax ID, name, entity type, payment, production eligibility, producer, production and payment information
	    Employee – user eAuth code, approval and compliance information
	    Other – none.
	
	    Trade Adjustment Assistance (TAA) :
	    Customer – SS#/Tax ID, name, entity type, payment, production eligibility, producer, production and payment information

DATA IN THE SYSTEM	
	Employee – user eAuth code, approval and compliance information
	Other – none.
2a. What are the sources of the information in the system?	**Cooperative Marketing Association System (CMA):** CMAs
	Price Support Systems Market and Assistance Loans: Name&Address, Producers, Acreage Reports
	Price Support
	Electronic Loan Deficiency Payments (ELDP)-Web: SCIMS (name & address), COPS (cotton receipt data), Compliance (acreage data), AGI & Eligibility web services.
	State Online Reporting System (SORS): Legacy Loan/LDP reporting data hosted on the NITC mainframe
	Electronic Warehouse Receipts (EWR) (Rice): Provider web service, SQL database, Mainframe
	Facility Loans
	Farm Storage Facility Loans (FSFL): SCIMS, Farm Program Contracts, and acreage reports.
	Sugar Storage Facility Loans (SFSL): SCIMS, Farm Program Contracts, and acreage reports.
	Market Loss
	MILC-X : Producer, actual production evidence, manual data input by COF employees. SCIMS, eMILC-X database, Subsidiary, MRT, NPS, eAuth and CBS
	Trade Adjustment Assistance (TAA) : Producer, actual production evidence, manual data input by COF employees. SCIMS, TAA database, Subsidiary, MRT, NPS, eAuth and CBS

DATA IN THE SYSTEM	

2b. What USDA files and databases are used? What is the source agency?	**Cooperative Marketing Association System (CMA):** Mainframe Subsidiary files; Farm Crop File; Crop Acreage Report
	
	Price Support Systems Market and Assistance Loans: Name & Address, Producers, Acreage Reports
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web: SCIMS (name & address), COPS (cotton receipt data), Compliance (acreage data), AGI & Eligibility web services, all originating from FSA.
	
	    State Online Reporting System (SORS): Legacy Loan/LDP reporting data hosted on the NITC mainframe, all originating from FSA.
	
	    Electronic Warehouse Receipts (EWR) (Rice): Provider web service, SQL database, Mainframe
	Facility Loans
	    Farm Storage Facility Loans (FSFL): NITC hosts USDA files and databases.
	
	    Sugar Storage Facility Loans (SFSL): NITC hosts USDA files and databases.
	
	Market Loss
	    MILC-X : SCIMS, eMILC-X database, Subsidiary, MRT, NPS, eAuth and CBS
	
	    Trade Adjustment Assistance (TAA) : SCIMS, TAA database, Subsidiary, MRT, NPS, eAuth and CBS

DATA IN THE SYSTEM

2c. What Federal Agencies are providing data for use in the system?	**Cooperative Marketing Association System (CMA):** USDA only.
	Price Support Systems Market and Assistance Loans: NASS/AMS (for peanuts)
	Price Support
	Electronic Loan Deficiency Payments (ELDP)-Web: None.
	State Online Reporting System (SORS): None.
	Electronic Warehouse Receipts (EWR) (Rice): None.
	Facility Loans
	Farm Storage Facility Loans (FSFL): None.
	Sugar Storage Facility Loans (SFSL): None.
	Market Loss
	MILC-X : AMS provides the Boston Class I Price in the Northeast under their Federal Milk Marketing Order to determine a monthly payment rate.
	Trade Adjustment Assistance (TAA) : FAS (Foreign Agricultural Service) provides petition information and approval details.

DATA IN THE SYSTEM

2d. What State and Local Agencies are providing data for use in the system?	**Cooperative Marketing Association System (CMA):** None
	Price Support Systems Market and Assistance Loans: Secretary of State provides UCC-1 data for marketing.
	Price Support
	Electronic Loan Deficiency Payments (ELDP)-Web: n/a
	State Online Reporting System (SORS): n/a
	Electronic Warehouse Receipts (EWR) (Rice):
	Facility Loans
	Farm Storage Facility Loans (FSFL): None.
	Sugar Storage Facility Loans (SFSL): None.
	Market Loss
	MILC-X : None.
	Trade Adjustment Assistance (TAA) : None.

DATA IN THE SYSTEM	

2e. From what other third party sources will data be collected?	**Cooperative Marketing Association System (CMA):**
	CMAs
	Price Support Systems Market and Assistance Loans:
	Buying point/Shellers/EWR, Incorporated
	Production records from outside entities
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    n/a.
	    State Online Reporting System (SORS):
	    n/a
	    Electronic Warehouse Receipts (EWR) (Rice):
	Provider webservice for electronic warehouse receipts
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    Credit Bureaus
	      Secretary of State – Lien Filing.
	      Federal bankruptcy court – Chapter 7, 11 and 12 filing notification
	    Sugar Storage Facility Loans (SFSL):
	    Credit Bureaus
	      Secretary of State – Lien Filing.
	
	Market Loss
	    MILC-X :
	    Production evidence received from milk handlers that contain a dairy operations actual production.
	    Trade Adjustment Assistance (TAA) :
	    Production evidence to show that producers have been impacted over the previous year.

DATA IN THE SYSTEM	
2f. What information will be collected from the customer/employee?	**Cooperative Marketing Association System (CMA):** Customer: Customer SS #s, Tax ID #s, Farm #s Employees: None **Price Support Systems Market and Assistance Loans:** Farm/Customer data Information pertaining to commodity being pledge as collateral (type, quantity and amount) **Price Support** **Electronic Loan Deficiency Payments (ELDP)-Web:** Acreage/Production information Eligibility information Producer information Customer profile – including Social Security/Tax ID Number, name, address, **State Online Reporting System (SORS):** n/a **Electronic Warehouse Receipts (EWR) (Rice):** Warehouse Receipt information, Price Support Benefit information **Facility Loans** **Farm Storage Facility Loans (FSFL):** Customer repayment ability. **Sugar Storage Facility Loans (SFSL):** Customer repayment ability. **Market Loss** **MILC-X :** Dairy information, producer information, production data. **Trade Adjustment Assistance (TAA) :** Production information as evidence to determine payment amount. Producer SSN/Tax ID and name. County employees approve applications based on information received.

DATA IN THE SYSTEM	

3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	**Cooperative Marketing Association System (CMA):**
	Reports and reasonability checks are performed.
	Error messages in system are generated when numbers do not match. These messages are investigated. Periodic reviews to confirm producers.
	
	Price Support Systems Market and Assistance Loans:
	Manually in some cases and system verification. COPs for EWRs.
	
	Price Support
	
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    Reasonability checks through eligibility and profile processes (i.e. certification).
	
	    State Online Reporting System (SORS):
	    n/a
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	System validation with error messages, view reports
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    Review with customer.
	
	    Sugar Storage Facility Loans (SFSL):
	    Review with customer.
	
	Market Loss
	    MILC-X :
	    Production evidence must come from a third party verifiable source, System validations, Compliance checks
	
	    Trade Adjustment Assistance (TAA) :
	    System validation and review by County Office Representative.

DATA IN THE SYSTEM

3b. How will data be checked for completeness?	**Cooperative Marketing Association System (CMA):** Manual and technical processes are used. **Price Support Systems Market and Assistance Loans:** System validations and manual checks. **Price Support** **Electronic Loan Deficiency Payments (ELDP)-Web:** Profile and application disbursement certification. **State Online Reporting System (SORS):** Summary reporting comparisons to legacy reporting system. **Electronic Warehouse Receipts (EWR) (Rice):** Summary report of electronic warehouse receipt with receipt information from Provider webservice and benefits information from County offices. **Facility Loans** **Farm Storage Facility Loans (FSFL):** Lien searches, employee checks in working with the data. **Sugar Storage Facility Loans (SFSL):** Lien searches, employee checks in working with the data. **Market Loss** **MILC-X :** System validations, manual spot checks, COR Reviews **Trade Adjustment Assistance (TAA) :** System validation and review by County Office Representative.

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)?	**Cooperative Marketing Association System (CMA):** Cooperatives, who are assigned a unique user ID; County offices grant role-based access to the cooperatives; Developers and Managers. **Price Support Systems Market and Assistance Loans:** Programmers, program managers, county office have view, some correction capabilities for active records. Ability to approve and disburse loans. Sellers can update and change their profiles. **Price Support** **Electronic Loan Deficiency Payments (ELDP)-Web:** Users/Managers access data through a web-based interface. **State Online Reporting System (SORS):** FSA employees can view edited/filtered reports. **Electronic Warehouse Receipts (EWR) (Rice):** County office employees (add/edit), FSA employees (view), National employees (view) **Facility Loans** **Farm Storage Facility Loans (FSFL):** County office users can update. State office specialists can review. Washington, DC personnel can review. **Sugar Storage Facility Loans (SFSL):** County office users can update. State office specialists can review. Washington, DC personnel can review. **Market Loss** **MILC-X :** COF personnel/users System Administrators **Trade Adjustment Assistance (TAA) :** County Office users, state and national FSA employees

ACCESS TO THE DATA	
	Authorized FAS employees
	System Administrators
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	**Cooperative Marketing Association System (CMA):** Access is determined by marketing agreement to cooperative. **Price Support Systems Market and Assistance Loans:** Consult Handbook policies (8-LP), User IDs and Passwords. **Price Support** **Electronic Loan Deficiency Payments (ELDP)-Web:** eAuthentication (Username/Password) & EAS authorization process maintained by Security staff **State Online Reporting System (SORS):** Viewable by authorized FSA employees. **Electronic Warehouse Receipts (EWR) (Rice):** eAuthentication (Username/Password) & EAS authorization process maintained by Security staff **Facility Loans** **Farm Storage Facility Loans (FSFL):** Only county personnel can see their customers' data. Data is password protected. **Sugar Storage Facility Loans (SFSL):** Only county personnel can see their customers' data. Data is password protected. **Market Loss** **MILC-X :** Currently only FSA personnel are users of the system which is accessed by eAuthentication and EAS Roles. **Trade Adjustment Assistance (TAA) :** FSA and FAS personnel are verified by eAuthorization 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.	**Cooperative Marketing Association System (CMA):** Access is restricted by User ID and Password. Users access the data via FTP. CMA office employees **Price Support Systems Market and Assistance Loans:** Yes, user access should be restricted to certain criteria. Different role based access. **Price Support** 　**Electronic Loan Deficiency Payments (ELDP)-Web:** 　Producer can only obtain information on his/her application. State, County, and National employees have role-based access. 　**State Online Reporting System (SORS):** 　Read-only access to FSA employees. 　**Electronic Warehouse Receipts (EWR) (Rice):** 　County office employees (add/edit), FSA employees (view), National employees (view) **Facility Loans** 　**Farm Storage Facility Loans (FSFL):** 　State offices have access to data from their state only. All county personnel have access to their county records only. 　**Sugar Storage Facility Loans (SFSL):** 　State offices have access to data from their state only. All county personnel have access to their county records only. **Market Loss** 　**MILC-X :** 　COF use is specified in an EAS role. 　KCMO can see all information. 　**Trade Adjustment Assistance (TAA) :** 　County Office users are restricted to only their assigned states and counties. 　FAS users are restricted to petition information and read-only access to producer information

ACCESS TO THE DATA	

4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	**Cooperative Marketing Association System (CMA):**
	User ID and Password; Security training. Secured FTP server.
	
	Price Support Systems Market and Assistance Loans:
	User ID and Password; Security training.
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	      eAuthentication (Username/Password)
	      EAS authorization
	      Security Awareness Training
	      Help screens.
	
	    State Online Reporting System (SORS):
	      Network authentication
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	      eAuthentication (Username/Password)
	      EAS authorization
	      Security Awareness Training
	      Help screens.
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	      User ID and Password; Security training.
	
	    Sugar Storage Facility Loans (SFSL):
	      User ID and Password; Security training.
	
	Market Loss
	    MILC-X :
	      eAuth and EAS role authorization.
	
	    Trade Adjustment Assistance (TAA) :
	      eAuth and EAS role authorization.

ACCESS TO THE DATA

5a. Do other systems share data or have access to data in this system? If yes, explain.	**Cooperative Marketing Association System (CMA):** No
	Price Support Systems Market and Assistance Loans:
	GIMS (Grain Inventory Management System)
	COPS (Cotton Online Processing System)
	Production Adjustment
	AMS (Agricultural Marketing Service)
	SORS (State Office Reporting System)
	Price Support
	Electronic Loan Deficiency Payments (ELDP)-Web: NPS, APSS.
	State Online Reporting System (SORS): No.
	Electronic Warehouse Receipts (EWR) (Rice): Provider web service provides receipt information, APSS provides PS Benefit information
	Facility Loans
	Farm Storage Facility Loans (FSFL): No.
	Sugar Storage Facility Loans (SFSL): No.
	Market Loss
	MILC-X : No
	Trade Adjustment Assistance (TAA) : No

ACCESS TO THE DATA	

5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	**Cooperative Marketing Association System (CMA):**
	System users and managers; Designated Approval Authority
	
	Price Support Systems Market and Assistance Loans:
	System users and managers; Designated Approval Authority
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    System users and managers; Designated Approval Authority
	
	    State Online Reporting System (SORS):
	    System users and managers; Designated Approval Authority
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    System users and managers; Designated Approval Authority
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    System users and managers; Designated Approval Authority
	
	    Sugar Storage Facility Loans (SFSL):
	    System users and managers; Designated Approval Authority
	
	Market Loss
	    MILC-X :
	    System users and managers; Designated Approval Authority
	
	    Trade Adjustment Assistance (TAA) :
	    System users and managers; Designated Approval Authority

ACCESS TO THE DATA	

6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	**Cooperative Marketing Association System (CMA):**
	No
	
	Price Support Systems Market and Assistance Loans:
	
	NASS, AMS, Federal State Inspection Service
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    No
	    State Online Reporting System (SORS):
	    No
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    No
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    No
	    Sugar Storage Facility Loans (SFSL):
	    No
	Market Loss
	    MILC-X :
	    Only through a FOIA request.
	
	    Trade Adjustment Assistance (TAA) :
	    FAS has read-only access to producer data. Their access is controlled by eAuthorization. No other International, Federal, State or Local agencies have access.

6b. How will the data be used by the agency?	See section 2.2

ACCESS TO THE DATA	

6c. Who is responsible for assuring proper use of the data?	**Cooperative Marketing Association System (CMA):** CMAs
	
	Price Support Systems Market and Assistance Loans:
	The employee that oversees access: CED in COF
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    The employee that oversees access: CED in COF
	    and the eAuthorization administrator
	
	    State Online Reporting System (SORS):
	    The employee that oversees access: CED in COF
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    The employee that oversees access: CED in COF
	    and the eAuthorization administrator
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    The employee that oversees access: CED in COF
	
	    Sugar Storage Facility Loans (SFSL):
	    The employee that oversees access: CED in COF
	
	Market Loss
	    MILC-X :
	    The person that controls access: CED in COF
	    and eAuthorization administrator
	
	    Trade Adjustment Assistance (TAA) :
	    The person that controls access: CED in COF
	    and eAuthorization administrator

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?	**Cooperative Marketing Association System (CMA):** Yes; data is maintained for use by CMAs

Price Support Systems Market and Assistance Loans: Yes

Price Support
  Electronic Loan Deficiency Payments (ELDP)-Web: Yes

  State Online Reporting System (SORS): Yes

  Electronic Warehouse Receipts (EWR) (Rice): Yes

Facility Loans
  Farm Storage Facility Loans (FSFL): Yes.

  Sugar Storage Facility Loans (SFSL): Yes

Market Loss
  MILC-X : Yes.

  Trade Adjustment Assistance (TAA) : Yes. |

ATTRIBUTES OF THE DATA	

2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	**Cooperative Marketing Association System (CMA):**
	Yes
	
	Price Support Systems Market and Assistance Loans:
	Yes. New data in the form of a Differential for peanuts and the loan benefit is created.
	
	Price Support
	
	   Electronic Loan Deficiency Payments (ELDP)-Web:
	   Yes
	
	   State Online Reporting System (SORS):
	   No
	
	   Electronic Warehouse Receipts (EWR) (Rice):
	   Yes
	Facility Loans
	
	   Farm Storage Facility Loans (FSFL):
	   Yes – storage capacity loaned and storage availability.
	
	   Sugar Storage Facility Loans (SFSL):
	   Yes – storage capacity loaned and storage availability.
	
	Market Loss
	
	   MILC-X :
	   Yes – payments information for all payments made through MILC-X system.
	
	   Trade Adjustment Assistance (TAA) :
	   Yes – TAA payment information about amount, qualifications, date to NPS and tracking number.

ATTRIBUTES OF THE DATA	
2b. Will the new data be placed in the individual's record (customer or employee)?	**Cooperative Marketing Association System (CMA):** Yes – for the cooperative. **Price Support Systems Market and Assistance Loans:** Yes – payment information **Price Support** **Electronic Loan Deficiency Payments (ELDP)-Web:** Yes, the new data will be placed in customer profiles as well as payment information. **State Online Reporting System (SORS):** n/a **Electronic Warehouse Receipts (EWR) (Rice):** **Receipt information will be stored for a producer** **Facility Loans** **Farm Storage Facility Loans (FSFL):** Yes – customers. **Sugar Storage Facility Loans (SFSL):** Yes – customers. **Market Loss** **MILC-X :** Yes. **Trade Adjustment Assistance (TAA) :** Yes – customer information related to payments.

ATTRIBUTES OF THE DATA	

2c. Can the system make determinations about customers or employees that would not be possible without the new data?	**Cooperative Marketing Association System (CMA):**
	No.
	
	Price Support Systems Market and Assistance Loans:
	Yes, after payment limitation is reached producer would be classified as ineligible.
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	        Yes, after payment limitation is reached producer would be classified as ineligible.
	
	    State Online Reporting System (SORS):
	        n/a
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	        n/a
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	        Yes.
	
	    Sugar Storage Facility Loans (SFSL):
	        Yes.
	
	Market Loss
	    MILC-X :
	        Yes.
	
	    Trade Adjustment Assistance (TAA) :
	        Yes – payment amount, date payment is made and qualifications.

ATTRIBUTES OF THE DATA

| 2d. How will the new data be verified for relevance and accuracy? | **Cooperative Marketing Association System (CMA):**
System messages and manual validations.

Price Support Systems Market and Assistance Loans:
Some manual validations are performed when required.

Price Support
Electronic Loan Deficiency Payments (ELDP)-Web:
System and manual validations

State Online Reporting System (SORS):
Comparison of Summary reports with legacy reports.

Electronic Warehouse Receipts (EWR) (Rice):
System and manual validations

Facility Loans
Farm Storage Facility Loans (FSFL):
County personnel verify data through manual reviews. State Office personnel review county personnel.

Sugar Storage Facility Loans (SFSL):
County personnel verify data through manual reviews. State Office personnel review county personnel.

Market Loss
MILC-X :
System and manual validations.

Trade Adjustment Assistance (TAA) :
System and manual validations. |

ATTRIBUTES OF THE DATA	

3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	**Cooperative Marketing Association System (CMA):** Secure DB2 tables.
	
	Price Support Systems Market and Assistance Loans: System validations.
	
	Price Support
	
	  Electronic Loan Deficiency Payments (ELDP)-Web: Profile and application disbursement certification.
	
	  State Online Reporting System (SORS): Privacy information is suppressed during display
	
	  Electronic Warehouse Receipts (EWR) (Rice): eAuth and EAS
	
	Facility Loans
	
	  Farm Storage Facility Loans (FSFL): Password protection provides discretionary access controls.
	
	  Sugar Storage Facility Loans (SFSL): Password protection provides discretionary access controls.
	
	Market Loss
	
	  MILC-X : eAuthentication provides discretionary access controls.
	
	  Trade Adjustment Assistance (TAA) : eAuthentication provides discretionary access controls.

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.	**Cooperative Marketing Association System (CMA):** Yes, User ID and password validation. **Price Support Systems Market and Assistance Loans:** System validations. **Price Support** **Electronic Loan Deficiency Payments (eLDP)-Web:** Yes – eAuthentication and role-based authorization. **State Online Reporting System (SORS):** Yes – web farm security infrastructure. **Electronic Warehouse Receipts (EWR) (Rice):** Yes – eAuthentication and role-based authorization. **Facility Loans** **Farm Storage Facility Loans (FSFL):** Yes, access is limited to county personnel only. **Sugar Storage Facility Loans (SFSL):** Yes, access is limited to county personnel only. **Market Loss** **MILC-X :** Yes – eAuthentication and role-based authorization. **Trade Adjustment Assistance (TAA) :** Yes – eAuthentication and role-based authorization.

ATTRIBUTES OF THE DATA	
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	**Cooperative Marketing Association System (CMA):** SSN/ID # can be used to retrieve data. CMAs can access data for members only. **Price Support Systems Market and Assistance Loans:** Yes – loan number or SS#/Tax ID #. **Price Support** **Electronic Loan Deficiency Payments (ELDP)-Web:** Query by state/county/producer id/eLDP# **State Online Reporting System (SORS):** Query by state/county/producer id/Loan/LDP # **Electronic Warehouse Receipts (EWR) (Rice):** eAuth/EAS User ID/password **Facility Loans** **Farm Storage Facility Loans (FSFL):** Yes – by authorized employees. Social Security Numbers and Tax IDs. **Sugar Storage Facility Loans (SFSL):** Yes – by authorized employees. Social Security Numbers and Tax IDs. **Market Loss** **MILC-X :** Yes. Name of dairy operation, producer tax ID # and producer name. **Trade Adjustment Assistance (TAA) :** Yes. Producer name, tax ID # and core customer ID.
4b. What are the potential effects on the due process rights of customers and employees of: • consolidation and linkage of files and systems; • derivation of data • accelerated information processing and decision making;	No impact

ATTRIBUTES OF THE DATA	
• use of new technologies.	

4c. How are the effects to be mitigated?	**Cooperative Marketing Association System (CMA):**
	Appeal process.
	
	Price Support Systems Market and Assistance Loans:
	Appeal process (manual not system driven).
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    Appeal process (manual not system driven)
	
	    State Online Reporting System (SORS):
	    n/a
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    Appeal process (manual not system driven)
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    n/a.
	
	    Sugar Storage Facility Loans (SFSL):
	    n/a.
	
	Market Loss
	    MILC-X :
	    Appeal process (manual not system driven)
	    Eligibility
	
	    Trade Adjustment Assistance (TAA) :

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.	**Cooperative Marketing Association System (CMA):**
	The same system is used for every customer. There is no potentially discriminating identification data collected and used.
	
	Price Support Systems Market and Assistance Loans:
	All users use the same system. System cannot be circumvented unless through manual intervention.
	
	Price Support
	    Electronic Loan Deficiency Payments (eLDP)-Web:
	      All users use the same system.. System cannot be circumvented unless through manual intervention.
	
	    State Online Reporting System (SORS):
	    n/a – reporting system
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    The same system is used for every customer. There is no potentially discriminating identification data collected and used.
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	      Set formulas are used.
	
	    Sugar Storage Facility Loans (SFSL):
	      Set formulas are used.
	
	Market Loss
	    MILC-X :
	      All users use the same system. COR reviews and spot checks are used to verify manual entry information is accurate.
	
	    Trade Adjustment Assistance (TAA) :
	      All producers are subject to the same logic within the software. System software is at one site – the webfarm and Ward Parkway office.

MAINTENANCE OF ADMINSTRATIVE CONTROLS

| 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? | **Cooperative Marketing Association System (CMA):**
All users access the same system and use the same software. The system and all software are located at a single site: Beacon.

Price Support Systems Market and Assistance Loans:
Back-ups/archives system are the same at all sites.

Price Support
Electronic Loan Deficiency Payments (ELDP)-Web:
All users access the same system, which is based on a single, centralized database.

State Online Reporting System (SORS):
All users access the same system, which is based on a single, centralized database.

Electronic Warehouse Receipts (EWR) (Rice):
All users access the same system and use the same software

Facility Loans
Farm Storage Facility Loans (FSFL):
Each county has its own records and uses the same software.

Sugar Storage Facility Loans (SFSL):
Each county has its own records and uses the same software.

Market Loss
MILC-X :
All system software is the same at all sites. Centralized system at Beacon location. Access through WEB.

Trade Adjustment Assistance (TAA) :
All system software is the same at all sites. Centralized system at Ward Parkway location. Access through WEB. |

MAINTENANCE OF ADMINSTRATIVE CONTROLS	

2b. Explain any possibility of disparate treatment of individuals or groups.	**Cooperative Marketing Association System (CMA):**
	n/a
	
	Price Support Systems Market and Assistance Loans:
	All users use the same system.
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    None, all users use the same system.
	
	    State Online Reporting System (SORS):
	    n/a
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    None, all users use the same system
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    None.
	
	    Sugar Storage Facility Loans (SFSL):
	    None.
	
	Market Loss
	    MILC-X :
	    None.
	
	    Trade Adjustment Assistance (TAA) :
	    None.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	

2c. What are the retention periods of data in this system?	**Cooperative Marketing Association System (CMA):**
	Data is retained indefinitely.
	
	Price Support Systems Market and Assistance Loans:
	5 years in county offices. 7 years at the national level.
	
	Price Support
	    Electronic Loan Deficiency Payments (eLDP)-Web:
	    Indefinitely.
	
	    State Online Reporting System (SORS):
	    7 years.
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    Indefinitely.
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    Data is retained indefinitely.
	
	    Sugar Storage Facility Loans (SFSL):
	    Data is retained indefinitely.
	
	Market Loss
	    MILC-X :
	    Indefinite
	
	    Trade Adjustment Assistance (TAA) :
	    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?	**Cooperative Marketing Association System (CMA):**
	Data is retained indefinitely, however data can be archived on removable media.
	
	Price Support Systems Market and Assistance Loans:
	'Close-out' procedure is executed on an annual basis, removing data older than 5 years old. Requirements are issued from the Price Support program division annually.
	
	Price Support
	  Electronic Loan Deficiency Payments (eLDP)-Web:
	  Data is retained indefinitely, however data can be archived on removable media.
	
	  State Online Reporting System (SORS):
	  'Close-out' procedure is executed on an annual basis, removing data older than 5 years old. Requirements are issued from the Price Support program division annually.
	
	  Electronic Warehouse Receipts (EWR) (Rice):
	  N/A, however data can be archived on removable media.
	
	Facility Loans
	  Farm Storage Facility Loans (FSFL):
	  Data is retained indefinitely, however data can be archived on removable media.
	
	  Sugar Storage Facility Loans (SFSL):
	  Data is retained indefinitely, however data can be archived on removable media.
	
	Market Loss
	  MILC-X :
	  Data is retained indefinitely, however data can be archived on removable media.
	
	  Trade Adjustment Assistance (TAA) :
	  Data is retained indefinitely, however data can be archived on removable media.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
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?	**Cooperative Marketing Association System (CMA):** Data is rolled over yearly. Current year data is used. **Price Support Systems Market and Assistance Loans:** Various legacy reports and back-up media.

Price Support

    Electronic Loan Deficiency Payments (eLDP)-Web:
    As per FSA Policy and Procedures.

    State Online Reporting System (SORS):
    Comparison of Summary reports with legacy reports.

    Electronic Warehouse Receipts (EWR) (Rice):
    Comparison of Summary reports with Provider webservice information

Facility Loans

    Farm Storage Facility Loans (FSFL):
    Annual reviews. Back-ups to data are current, accurate and   have not been changed.

    Sugar Storage Facility Loans (SFSL):
    Annual reviews. Back-ups to data are current, accurate and   have not been changed.

Market Loss

    MILC-X :
    As per FSA Policy and Procedures. (contact David Goodman for details)

    Trade Adjustment Assistance (TAA) :
    As per FSA Policy and Procedures. (contact David Goodman for details)
    Producer data is refreshed each time an application is modified. Producer data seldom changes within evaluation process for a single application.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	

3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	**Cooperative Marketing Association System (CMA):**
	No
	
	Price Support Systems Market and Assistance Loans:
	n/a.
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    n/a.
	
	    State Online Reporting System (SORS):
	    n/a
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    n/a.
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    n/a.
	
	    Sugar Storage Facility Loans (SFSL):
	    n/a.
	
	Market Loss
	    MILC-X :
	    n/a.
	
	    Trade Adjustment Assistance (TAA) :
	    n/a.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	

3b. How does the use of this technology affect customer/employee privacy?	**Cooperative Marketing Association System (CMA):**
	n/a
	
	Price Support Systems Market and Assistance Loans:
	n/a
	
	Price Support
	    Electronic Loan Deficiency Payments (ELDP)-Web:
	    n/a
	
	    State Online Reporting System (SORS):
	    n/a.
	
	    Electronic Warehouse Receipts (EWR) (Rice):
	    n/a.
	
	Facility Loans
	    Farm Storage Facility Loans (FSFL):
	    n/a.
	
	    Sugar Storage Facility Loans (SFSL):
	    n/a.
	
	Market Loss
	    MILC-X :
	    n/a.
	
	    Trade Adjustment Assistance (TAA) :
	    n/a.

MAINTENANCE OF ADMINSTRATIVE CONTROLS

4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u>? If yes, explain.	**Cooperative Marketing Association System (CMA):** Only the state and county in which the cooperative operates are identified. Individuals cannot be identified, located, or monitored. CMA does this for its association members.

Price Support Systems Market and Assistance Loans:

Yes, workstation I.D. and producer info is recorded.

Price Support

Electronic Loan Deficiency Payments (ELDP)-Web:
Yes, user identification and producer info is recorded.

State Online Reporting System (SORS):
Producer information is recorded.

Electronic Warehouse Receipts (EWR) (Rice):
Yes, user identification and producer info is recorded.

Facility Loans

Farm Storage Facility Loans (FSFL):
Yes, workstation I.D. and producer info is recorded.

Sugar Storage Facility Loans (SFSL):
Yes, workstation I.D. and producer info is recorded.

Market Loss

MILC-X :
Yes, user identification and producer info is recorded.

Trade Adjustment Assistance (TAA) :
Yes, user identification and producer info is recorded.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
4b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	**Cooperative Marketing Association System (CMA):** No **Price Support Systems Market and Assistance Loans:** n/a **Price Support** 　**Electronic Loan Deficiency Payments (ELDP)-Web:** 　n/a 　**State Online Reporting System (SORS):** 　n/a 　**Electronic Warehouse Receipts (EWR) (Rice):** 　n/a. **Facility Loans** 　**Farm Storage Facility Loans (FSFL):** 　No. 　**Sugar Storage Facility Loans (SFSL):** 　No. **Market Loss** 　**MILC-X :** 　No. 　**Trade Adjustment Assistance (TAA) :** 　No.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	
4c. What controls will be used to prevent unauthorized monitoring?	**Cooperative Marketing Association System (CMA):** User ID and password validations. **Price Support Systems Market and Assistance Loans:** n/a **Price Support** **Electronic Loan Deficiency Payments (ELDP)-Web:** eAuthentication and role-based authorization. **State Online Reporting System (SORS):** Network authentication. **Electronic Warehouse Receipts (EWR) (Rice):** eAuthentication and role-based authorization. **Facility Loans** **Farm Storage Facility Loans (FSFL):** n/a. **Sugar Storage Facility Loans (SFSL):** n/a. **Market Loss** **MILC-X :** eAuthentication and role-based authorization. **Trade Adjustment Assistance (TAA) :** eAuthentication and role-based authorization.

MAINTENANCE OF ADMINSTRATIVE CONTROLS	

5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	**Cooperative Marketing Association System (CMA):**
	USDA/FSA-2 – Farm Records File (Automated)
	USDA/FSA-14 – Applicant/Borrower
	
	Price Support Systems Market and Assistance Loans:
	USDA/FSA-2 – Farm Records File (Automated)
	USDA/FSA-14 – Applicant/Borrower
	
	Price Support
	   Electronic Loan Deficiency Payments (ELDP)-Web:
	    USDA/FSA-2 – Farm Records File (Automated)
	    USDA/FSA-14 – Applicant/Borrower
	
	   State Online Reporting System (SORS):
	    USDA/FSA-2 – Farm Records File (Automated)
	
	   Electronic Warehouse Receipts (EWR) (Rice):
	    USDA/FSA-2 – Farm Records File (Automated)
	
	Facility Loans
	   Farm Storage Facility Loans (FSFL):
	    USDA/FSA-2 – Farm Records File (Automated)
	    USDA/FSA-14 – Applicant/Borrower.
	
	   Sugar Storage Facility Loans (SFSL):
	    USDA/FSA-2 – Farm Records File (Automated)
	    USDA/FSA-14 – Applicant/Borrower.
	
	Market Loss
	   MILC-X :
	    USDA/FSA-2 – Farm Records File (Automated)
	    USDA/FSA-14 – Applicant/Borrower.
	
	   Trade Adjustment Assistance (TAA) :
	    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

Price Support Systems (PSS)

(System Name)

This document has been completed in accordance with the requirements of the EGovernment Act of 2002.
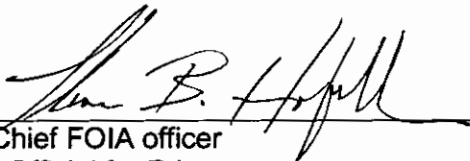
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.
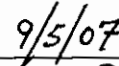

System Manager/Owner
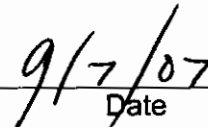OR Project Representative
OR Program/Office Head

Aug 16, 2007
Date

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

9/5/07
Date

Agency CIO

9/7/07
Date

APSS	Automated Price Support System
C2	Controlled Access Protection, Class Two
CD-ROM	Compact Disk-Read Only Memory
CMA	Cooperative Marketing Association System
CMP	Configuration Management Plan
COMPUSEC	Computer Security
COMSEC	Communications Security
COOP	Continuity of Operations Plan
ELDP	Electronic Loan Deficiency Payments
EWR	Electronic Warehouse Receipts
FOIA	Freedom of Information Act
FOUO	For Official Use Only
FSFL	Farm Storage Facility Loans
HP	Hewlett Packard
I&A	Identification and Authentication
IAW	In accordance with
ID	Identification
INFOSEC	Information Security
IP	Internet Protocol
ISSO	Information Systems Security Officer
LAN	Local Area Network
MRT	Master Reference Table
NCSC	National Computer Security Center
NPS	National Payment Service
NRCS	Natural Resources Conservation Service
NT	New Technology
OPSEC	Operations Security
PA	Privacy Act
PSS	Price Support System
SA	System Administrator
SAAR	System Authorization Access Request
SBU	Sensitive-but-Unclassified
SCIMS	Service Center Information Management System
SFUG	Security Features User Guide
SOP	Standing Operating Procedure
SORS	State Online Reporting System
SQL	Structured Query Language
STD	Standard
TAA	Trade Adjustment Assistance
TFM	Trusted Facility Manual
TG	Trusted Guide
TIN	Taxpayer Identification Number
USDA	United States Department of Agriculture
USER ID	User Identification
U.S.C	United States Code
WWW	World Wide Web