

USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: USDA Rural Development

System Name: eGovernment (eGov) Services

eGov consists of:

Electronic Forms (eForms)

Grant Interface Manager (GIM)

Customer Initiated Payment (CIP)

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

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

Description of the System:

Eforms is a web-based system created to lessen the public paperwork burden. This is mandated by the Paperwork Reduction Act and more recently, as part of the Administration's regulatory reform efforts, former President Clinton directed Federal agencies to increase their use of electronic means of information collection and, where feasible, to decrease the frequency of reporting by the public by 50%.

USDA Grant Interface Manager (GIM) is a web-based system created to interface with Grants.gov, a Grant Find and Apply web-based system that was one of the Presidential eGovernment Initiatives. GIM accomplishes its goal by providing USDA employees access to information and forms on a 24/7 timeframe to submission of specified Grant forms via the Internet, allowing Grant making agencies to process electronically submitted Grants more efficiently, automating the process of providing interaction through paper format and faxes.

Customer Initiated Payment (CIP) is a web-based system created to interface with Pay.gov, a payment processing service maintained and operated by the Treasury Department. CIP provides a Rural Development Enterprise solution for both Consumer and Commercial customers to make loan payments over the internet.

Who owns this system?

Kathy Anderson
Branch Chief, Enterprise Technologies
USDA Rural Development
4300 Goodfellow Boulevard, FC-42
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(314)- 457-5012

Who is the security contact for this system?

USDA PRIVACY IMPACT ASSESSMENT FORM

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Who completed this document?

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

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

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

¹ 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.

eForms - Customer Information: Borrower and Management Agent Identification Numbers, social security numbers, debt payment information, client names, lender names, and addresses.

Employee Information: Name, eAuthID, phone numbers, duty station and agency.

GIM - Customer Information: Organization Name, DUNS ID, Key Contacts

Employee Information: Name, eAuthID, phone numbers, agency.

CIP - Customer Information: Checking Account Number, Checking Routing Number, Amount of Payment, Loan Account ID.

4. Is the collection of the data both relevant and necessary to the purpose for which the system is designed? In other words, the data is absolutely needed and has significant bearing on the system's purpose.

Yes

4.1. Explain.

eForms - The data represents an electronic service delivery channel that supplements existing business processes employed by County Servicing Offices for FSA, NRCS, and RD programs. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for Citizens to Mail, Fax, or Drive available electronic interactions to these County Servicing Offices.

GIM - The data represents an electronic service delivery channel that supplements existing business processes employed by USDA Grant making programs. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for Citizens to Mail, Fax, or Drive available electronic interactions to these Grant making programs.

CIP - The data represents an electronic service delivery channel that supplements existing business processes employed by USDA Rural Development Loan making programs. It allows citizens to make a Loan Payment over the internet.

5. Sources of the data in the system.

5.1. What data is being collected from citizens and/or employees?

eForms - Information included contains social security numbers of borrowers, management agents, key members, and tenant social security numbers, debt payment information, customer names, tenant names, addresses, and business financial data.

GIM - Information collected from Customers is done through www.Grants.gov and is restricted to the SF-424 Transaction.

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Information collected from Employees is restricted to USDA eAuthentication Employee registration and is done through USDA eAuthentication. [SF-424 includes Applicants EIN's, names and addresses]

CIP - Information collected from Customers is done through either <https://mai.sc.egov.usda.gov> (Consumer) or <https://rdupeip.sc.egov.usda.gov> (Commercial) and is restricted to payment information.

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

eForms - User supplied information on OMB Approved Public Burden information collections

-User supplied information from USDA Employees when processing service requests.

-The Farm Service Agency and Natural Resources Conservation Service both provide additional electronic form templates and configuration data for the system. Configuration data is:

- Program data – Program Name, Program Code, etc.
- Form data – Form Prefix, Form Title, Description, Template File Name, Help Instruction File Name, OMB Control Number, Search Keys (Taxonomy associations for enhanced category based searches)
- Program to Form relationship – The Forms a Program uses to deliver service to a constituent

GIM - Grants.gov originated Grant Applications submitted to these participating programs:

<u>Agency</u>	<u>Number of Applications received since 1/08</u>
AMS	6
APHIS	41
ARS	1
CSREES	119
ERS	2
FAS	10
FNS	3
NASS	1
NRCS	30
NSIIC	2
RD	242
RMA	8

CIP - None

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

eForms - None

GIM - HHS is the Program Management Office for www.Grants.gov. All Customer Grant data collections originate at www.Grants.gov. USDA Grantors obtain access to GIM through USDA

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eAuthentication Security Roles assignment through a Local Registration Authority (LRA). USDA Employees with Agency Administrator or Agency Manager roles supply more granular Application Authorization information that is not Privacy Act data, e.g., data view authority based on Catalog of Federal Domestic Assistance (CFDA) number, State, Country, etc.

CIP - None

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

eForms - As it relates to system data, not user supplied data, the following external authoritative sources provide system data:

- Office Information Profile (OIP) – Provides Service Center Office identifiers. These identifiers represent the routing decision made by a user of the electronic form service delivery channel.
- EmPowHR – Provides the intake process for all USDA Service Center employee profiles and subsequent authentication and authorization decisions.

GIM - As it relates to system data, not user supplied data, the following external authoritative sources provide system data:

- USDA eAuthentication – Provides authentication profile information.

www.Grants.gov provides all Grant Application data compliant with OMB SF-424 Transactions

CIP - As it relates to system data, not user supplied data, the following external authoritative sources provide system data:

- USDA eAuthentication – Provides authentication profile information.
- MortgageServ – Provides Consumer Loan information
- RULSS – Provides Commercial Loan information

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

eForms - The source of information is taken from the individual and from USDA eAuthentication.

GIM - The source of information is from two primary contributing communities:

1. Participating Organization and Individuals with Grants.gov “Apply”
2. USDA Participating Organizations configuring routing information for their respective organizations.

CIP – The source of information is taken from the individual and from USDA eAuthentication.

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

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eForms - Manual inspection of electronic form information by authorized USDA Service Center employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide.

GIM - Manual inspection of Grant Application information by authorized USDA employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide.

CIP - Loan customers provide a Checking Account Number, Routing Number, and Payment Amount. The Account Number and Routing Number data information is validated against DLOS or RULSS. On successful validation, this information is sent to Pay.gov for processing. Pay.gov responses are then sent to underlying Loan Servicing systems, DLOS and RULSS.

- 6.2. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness? Verification for accuracy, relevance, timeliness, and completeness of non-USDA sources is done through human inspection by authorized system users.

eForms - Manual inspection of electronic form information by authorized USDA Service Center employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide.

GIM - Manual inspection of Grant Application information by authorized USDA employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide.

CIP - Loan customers provide a Checking Account Number, Routing Number, and Payment Amount, this information is sent to Pay.gov for processing. Pay.gov responses are then sent to underlying Loan Servicing systems.

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?

eForms - Provide compliance with the Freedom to eFile Act

GIM - To provide a single point of integration between USDA and Grants.gov for receiving and routing all Grant Applications submitted through the Grants.gov Apply service.

CIP - To provide a single point of integration between USDA Rural Development and Pay.gov for collecting and processing on-line loan payments submitted through the enabled loan systems.

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

No

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9. 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.

10. 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?

eForms - Provide compliance with the Freedom to eFile Act

GIM - To provide a single point of integration between USDA and Grants.gov for receiving and routing all Grant Applications submitted through the Grants.gov Apply service.

CIP To provide a single point of integration between USDA Rural Development and Pay.gov for collecting and processing on-line loan payments submitted through the enabled loan systems.

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

No.

12. 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.

13. Are processes being consolidated?

Yes. CIP is consolidating the on-line loan payment process.

DATA RETENTION

14. Is the data periodically purged from the system?

No.

15. 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?

Manual inspection by authorized USDA employees and/or contractors.

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

Yes

DATA SHARING

17. Will other agencies share data or have access to data in this system (i.e. international, federal, state, local, other, etc.)?

Yes

17.1. How will the data be used by the other agency?

eForms - The data represents an electronic service delivery channel that supplements existing business processes employed at County Servicing Offices for FSA, NRCS, and RD programs. FSA and NRCS send their information to RD and an ISA is their responsibility. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for Citizens to Mail, Fax, or Drive available electronic interactions to these County Servicing Offices.

GIM - The data represents an electronic service delivery channel that supplements existing business processes employed at USDA Grant making programs. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for Citizens to Mail, Fax, or Drive available electronic interactions to these Grant making programs.

CIP – Data is NOT used by any other agency.

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

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(314)457-5012
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18. Is the data transmitted to another agency or an independent site?

Yes

eForms - Currently, the Farm Service Agency, Natural Resources Conservation Service, and Rural Development have access to their respective data.

GIM - Currently, USDA Grant making programs have access to their respective data.

CIP – On-line loan payments are sent to Pay.gov for processing.

18.1. Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

Not at this time. The ISA is in progress.

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

No. Currently the entire system is hosted in the STL web farm.

DATA ACCESS

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

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

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

Privileges granted are based on job functions and area of authority (e.g. State office user with authority for their state only).

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

The controls in place to identify users and system personnel within all systems are documented in the respective Systems Security Plan, Section 6.

As far as User IDs is concerned, USDA eAuthentication processes requests and UserIDs for eForms, GIM and CIP, for both Level 2 Public and Employee credentials.

As far as the Role Based Access Control, an assigned and authorized Role Administrator who is an employee of USDA uses USDA eAuthentication CA Identity minder to fulfill this obligation.

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

eForms - Access to data is only available through USDA eAuthentication level 2 access, and the need-to-know privileges to eForms.

GIM - Access to data is only available through USDA eAuthentication level 2 access, and the need-to-know privileges to GIM.

CIP - Access to data is only available through USDA eAuthentication level 2 access, and the need-to-know privileges to CIP.

22.1. Are procedures in place to detect or deter browsing or unauthorized user access? Procedures to detect or deter browsing or unauthorized user access are defined in the business requirements and enforced through role based access control application architecture. Role Based administration supporting the role based access control application implementation is handled through USDA eauthentication CA identity minder.

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

Yes, through strong authentication procedures.

CUSTOMER PROTECTION

24. 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.)?

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Office: 314-457-5012
Kathy.Anderson@stl.usda.gov

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

Citizens and employees may contact the Freedom of Information Officer:

Dorothy Hinden
Freedom of Information Officer
Rural Development, USDA
7th Floor, Reporter's Bldg.
Washington, DC 20250
Dorothy.Hinden@wdc.usda.gov
(202)692-0031

26. 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?

Yes - If YES, where is the breach notification policy located?

- U.S. Department of Agriculture Incident Notification Plan September 2007

- DM3505-001 USDA Computer Incident Response Procedures Manual.

- Computer Incident Response Standard Operating Procedures (CIRT)

27. 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

28. How will the system and its use ensure equitable treatment of customers?

DM 3515-002, section e states:

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To fulfill the commitment of the USDA to protect customer and employee data, several issues must be addressed with respect to privacy:

- 1 The use of information must be controlled; and
- 2 Information may be used only for a necessary and lawful purpose.

Where Public Affairs systems of records are involved:

- 1 Individuals must be informed in writing of the principal purpose and routine uses of the information being collected from them;
- 2 Information collected for a particular purpose should not be used for another purpose without the subject's consent unless such other uses are specifically authorized or mandated by law; and
- 3 Any information used must be sufficiently accurate, relevant, timely, and complete to assure fair treatment of the individual.

Also, P.L. 95-454, the Civil Service Reform Act of 1978 which is enforced by The U.S. Equal Employment Opportunity Commission (EEOC) ensures the equitable treatment of the employees.

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

No

SYSTEM OF RECORD

- 30.** 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?

No, information cannot be retrieved by personal identifier. User supplied data is retrieved through their USDA eAuthentication identifier assigned to them during the LRA process.

TECHNOLOGY

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

No

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

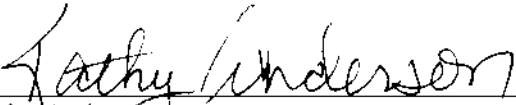
Privacy Impact Assessment Authorization
Memorandum

I have carefully assessed the Privacy Impact Assessment for the

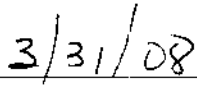
eGovernment Services _____
(System Name)

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

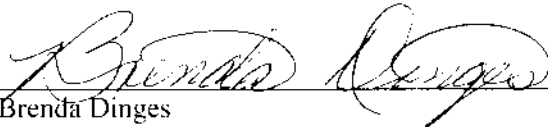
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.



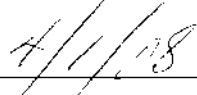
Kathy Anderson
System Manager/Owner
OR Project Representative
OR Program/Office Head.



Date



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



Date



John Distler
Agency OCIO



Date