



**Privacy Impact Assessment
(PIA)
Cooperative Marketing Association System
(CMA)**

Revision: *Final*



Farm Service Agency

Date: *May 11, 2010*



Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	May 11, 2010	Anita Trader, ISO DR	Initial version for 2010 populated from 2009 PIA.
1.02	June 9, 2010	Judy Sobbing, ECS	Reviewed and updated based on standard descriptions suggested by Privacy Officer.
1.03	Aug 4, 2010	C. Niffen	Changed per John Underwood questions 4, 26
Final	Aug 5, 2010	R. Barbee, ECS	Attached signatures to finalize document.

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1 Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner’s requirements presents any threats to privacy.”

The Privacy Impact Assessment (PIA) document contains information on how the **Cooperative Marketing Association System** 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 System

Information

System Information

System Information	
Agency:	Farm Service Agency.
System Name:	Cooperative Marketing Association System.
System Type:	Major Application
	General Support System
	Non-major Application
System Categorization (per FIPS 199):	High
	Moderate
	Low
Description of System:	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.
Who owns this system? (Name, agency, contact information)	Sharon Marshall USDA/F SA/ITSD/PARMO 6501 Beacon Drive Kansas City, MO 64133 (816) 926-2133 Sharon.Marshall@kcc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) USDA/FSA/IT SD/ISO 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov

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Who completed this document? (Name, agency, contact information)	Mike Pace USDA/F SA/ITSD/PARMO 6501 Beacon Drive Kansas City, MO 64133 (816) 926-6599 mike.pace@kcc.usda.gov
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3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Social Security Numbers, Tax ID Numbers, Farm Numbers.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	Yes
		No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	The Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397.
3	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 No
4	Sources of the data in the system.	FSA CMAs and LSAs transmitted files.
4.1	What data is being collected from the customer?	Customer: Social Security Numbers, Tax ID Numbers, Farm Numbers.
4.2	What USDA agencies are providing data for use in the system?	FSA.
4.3	What state and local agencies are providing data for use in the system?	None.
4.4	From what other third party sources is data being collected?	CMAs and LSAs
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	Yes No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Data collected from customers is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness manually by State and County personnel upon initial entry into the system and then again when any required updates are made.

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No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data from USDA sources are checked for accuracy and completeness upon entry into the source system. In addition, system validation checks are performed.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data from non-USDA sources (CMAs and LSAs) are checked for accuracy and completeness upon entry into the source system. In addition, system validation checks are performed.

3.2 Data Use

No.	Question	Response
6	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?	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.
7	Will the data be used for any other purpose?	Yes No – If NO, go to question 8.
7.1	What are the other purposes?	N/A.
8	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 s N o
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.)?	Yes No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	Yes No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	Yes No

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No.	Question	Response
9.3	How will the new data be verified for relevance and accuracy?	System messages and manual validations.
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?	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 CMAs, LSAs and DMAs.
11	Will the data be used for any other uses (routine or otherwise)?	Yes No – If NO, go to question 12.
11.1	What are the other uses?	N/A.
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?	Yes No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	Mainframe ACF2 and DB2 security provides for Authentication and Authorization to application and database resources.
13	Are processes being consolidated?	Yes No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	Secure FTP transmissions, automated batch processes. User ID and password validation are required for system operators.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	Yes
		No – If NO, go to question 15.

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No.	Question	Response
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Data stays in the active system for 3 years. Backups are taken at the end of the cycle (twice weekly) are kept for 60 days. Backups taken weekly for DR are kept for 60 days.
14.2	What are the procedures for purging the data at the end of the retention period?	Data is purged once a year to start the next fiscal year processing. Any data older than 2 years is also purged at that time.
14.3	Where are these procedures documented?	Purging procedure documentation located at K:\applications\DBMO-APPS\db2\oS390\mcx_CMA_System\PLANS\CMA 2009 rollover in PROD.doc .
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?	Data is reviewed for accuracy, relevancy, timeliness and completeness upon receipt of transmission or when other legacy systems are updated.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Yes s No

3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	Yes
		No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	N/A.
17.2	Who is responsible for assuring the other agency properly uses the data?	N/A.
18	Is the data transmitted to another agency or an independent site?	Yes
		No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	Marketing Association agreements are in place.
19	Is the system operated in more than one site?	Yes No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	N/A.

3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	The CMA application does not provide direct access to the application and related database. CMAs, LSAs and DMAs are provided reports from the application for members only. County offices have access to FSA information via the legacy applications for research. System Operations are granted role-based access to CMA processes using ACF2 and DB2 assigned roles.
21	How will user access to the data be determined?	Access is determined by marketing agreement to cooperative (CMAs and LSAs).
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes
		No
22	How will user access to the data be restricted?	Reports are provided to CMAs and LSAs for members only. CMAs and LSAs along with FSA National Management access the reports via a secure FTP channel from the CMA office.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	Yes
		No

3.6 Customer Protection

No.	Question	Response
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.)?	FSA Privacy Act Officer/FSA PII Officer.

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No.	Question	Response
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	FSA National Help Desk at (800)-255-2434 or the Centralized Help Desk at 800-457-3642 or By contacting John W. Underwood, Privacy Officer, at FSA Privacy Act Officer / FSA PII Officer USDA - Farm Service Agency Beacon Facility - Mail Stop 8388 9240 Troost Avenue Kansas City, Missouri 6413 1-3055 Phone: 816-926-6992 Cell: 816-564-8950 Fax: 816-448-5833 mailto:john.underwood@kcc.usda.gov
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, go to question 27. No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	N/A.
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)?	Yes No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	N/A.
28	How will the system and its use ensure equitable treatment of customers?	By providing a centralized and standardized method of transmitting program information for decision making by CMAs, LSAs and DMAs.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	Yes No – If NO, go to question 30.
29.1	Explain	N/A.

4 System of Record

No.	Question	Response
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?	Yes No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data is transmitted via reports and lookups can be performed using Social Security Numbers, Tax ID Numbers, and Farm Numbers to retrieve data. CMAs are provided data for members only.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	USDA/FSA-2 - Farm Records File (Automated). USDA/FSA-14 - Applicant/Borrower.
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes
		No

5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<p data-bbox="911 422 964 449"><u>Yes</u></p> <p data-bbox="911 449 1414 476">No – If NO, the questionnaire is complete.</p>
31.1	How does the use of this technology affect customer privacy?	N/A.

Privacy Impact Assessment for

Cooperative Marketing Association System (CMA)

6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-1 1, 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 FOR CYBER SECURITY.

USDA

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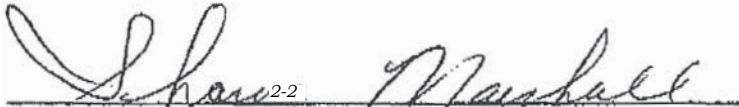


Privacy impact Assessment Authorization hilemorancitha

I have carefully assessed the Privacy Impact Assessment for the
Cooperative Marketing Association System

This document has been completed in accordance with the requirements of the E.Government
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.


Sharon Marshall, Information Syste Owner

7 7/a
Date

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John Underwood, Chief Privacy OiWcer

Si i I 10
Date


James Gwinn, FSA CIO

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Date