



**Privacy Impact Assessment
(PIA)**

**Subsidiary System
Fiduciary/POA Application (F/POA)**

Revision: *Final*

Farm Service Agency

Date: *June 4, 2010*





Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	June 4, 2010	Anita Trader, ISO DR	Populated from 2009 PIA
1.02	June 14, 2010	E.Shaner	Review for standard responses.
1.03	June 15, 2010	Judy Sobbing, ECS	Review and update
	June 24, 2010	C. Niffen	Made changes per John Underwood on questions 6, 10, and 28
Final	June 30, 2010	S. Timbrook, ECS	Marked final, added signatures



Privacy Impact Assessment for
Executive/POA Application (E/POA)



Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the
Priority/POA Application

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 Lovelace, Information System Owner
Date 6-18-10


John Underwood, Chief Privacy Officer
Date 6/13/10


James Oyster, NSA CIO
Date 6/18/2010

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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 Subsidiary Systems FISMA Child: **Fiduciary/POA Application** 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:	Fiduciary/POA Application.
System Type:	Major Application
	General Support System
	Non-major Application
System Categorization (per FIPS 199):	High
	Moderate
	Low
Description of System:	The Fiduciary system is a web-based application used to manage fiduciary agreements; recording, updating, terminating and reporting capabilities are provided through the application. Agreement types supported in the initial release are conservatorships, guardianships, power of attorney, and spousal relationships. Additionally, capability is provided to record the death of a FSA customer. Note that recording a conservatorship or a death notification will also result in the termination of any other fiduciary agreement that the incompetent or deceased party participates in.
Who owns this system? (Name, agency, contact information)	Sharon Lovelace ITSD/ADC/PARMO/FRG 6501 Beacon Drive Kansas City, MO 64133 (816) 926-2115 sharon.lovelace@kcc.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) USDA/F SA/ITSD/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)	P. Siemiatkowski PARMO/FRG 6501 Beacon Drive Kansas City, MO 64133 (816) 926-2117 Pamela.Siemiatkowski@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.	Core Customer ID, eAuthorization ID, Name, Tax ID and Tax ID Type, State/County, Crop and Program information, Spousal Information, Minor Children and Parent/Guardian information, Conservatorship information, Deceased information, FSA Power of Attorney information, and Non-FSA Power of Attorney information, Signing Authority.
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 tables and SCIMS, Customer/Farmer input via FSA Service Centers.
4.1	What data is being collected from the customer?	Core Customer ID, eAuth ID, Name, Tax ID and Tax ID Type, State/County, Crop and Program information, Spousal Information, Minor Children and Parent/Guardian information, Conservatorship information, Deceased information, FSA Power of Attorney information, and Non-FSA Power of Attorney information, Signing Authority.
4.2	What USDA agencies are providing data for use in the system?	FSA SCIMS application and FSA Master Reference Table.
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?	None.

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No.	Question	Response
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 by State and County personnel upon initial entry into the system and then again when any required updates are made.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data collected from USDA sources is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A.

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?	To manage (record, update, terminate, and report) fiduciary agreements such as conservatorships, death notifications, guardianships, power of attorney, signing authority, personal relationships, and spousal relationships
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
		No
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.

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No.	Question	Response
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
9.3	How will the new data be verified for relevance and accuracy?	N/A.
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?	To manage (record, update, terminate, and report) fiduciary agreements such as conservatorships, death notifications, guardianships, power of attorney, signing authority, personal relationships, and spousal relationships.
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?	N/A.
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?	N/A.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	Yes
		No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	N/A.

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No.	Question	Response
14.2	What are the procedures for purging the data at the end of the retention period?	N/A.
14.3	Where are these procedures documented?	N/A.
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?	This data is supplementary and pertains to personal relationships and signing authority, and does not directly impact program decisions.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Yes
		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?	N/A.
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?	Administrative controls and procedures are established to maintain consistent system use.

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.)?	FSA County, State, and National employees will view and update information via the web application. FSA IT Administrators, FSA Database Administrators.
21	How will user access to the data be determined?	Access must be requested through FSA- 1 3A security forms with justification and approval.

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No.	Question	Response
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes
		No
22	How will user access to the data be restricted?	Identification and Authentication is performed by USDA eAuthentication, OS/400 and S36, Mainframe ACF2, Sun Solaris Operating System (userID and password required). Authorization is performed by roles within FSA Extensible Authorization System, all database systems, Mainframe ACF2, and S36 partitions.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes
		No
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.
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

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No.	Question	Response
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 managing fiduciary agreements
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.)?	<p>The only external retrieval is to return the relationship data of the Principal and Agent(s) specified in the agreements found in the search. And the search will only return data from the following Fiduciary Agreement types: Fiduciary Spousal Relationship and Fiduciary Guardianship.</p> <p>Fiduciary agreements can be retrieved by a personal identifier. This personal identifier is the CCID of the Principal or the Agent on the agreement.</p>
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)
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)?	Yes
		No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	No affect on customer privacy.

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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.