



# **Privacy Impact Assessment**

**Guaranteed**

*Revision: 1.2*

*USDA Rural Development*

*Date: July, 2009*



## Document Information

Owner Details	
Name	Greg Eschman
Contact Number	(314) 457-5057
E-mail Address	<a href="mailto:greg.eschman@stl.usda.gov">greg.eschman@stl.usda.gov</a>

Revision History			
Revision	Date	Author	Comments
1.0	19 Nov 2008	Tom Case	New Document
1.1	07 Feb 2009	Tom Case	Update #25 FOI POC
1.2	10 Feb 2009	Felicia Williams	Updated System Description
1.3	28 May 2009	Felicia McCain	Updates throughout document

Distribution List			
Name	Title	Agency/Office	Contact Information
Greg Eschman	System Owner	USDA/RD/O&M/DCIO/Guaranteed Loan Technologies Branch	<a href="mailto:greg.eschman@stl.usda.gov">greg.eschman@stl.usda.gov</a> (314) 457-5057
Kelly Elli	System POC	USDA/RD/O&M/DCIO/Guaranteed Loan Technologies Branch	<a href="mailto:kelly.elli@stl.usda.gov">kelly.elli@stl.usda.gov</a> (314) 457-5066
Marilyn Deming	System POC	USDA/RD/O&M/DCIO/Guaranteed Loan Technologies Branch	<a href="mailto:marilyn.deming@stl.usda.gov">marilyn.deming@stl.usda.gov</a> (314) 457-5059
Eugene Texter	Information System Security	USDA/RD/O&M/DCIO/ISSS	<a href="mailto:eugene.texter@stl.usda.gov">eugene.texter@stl.usda.gov</a> (314) 457-4778
Bill Dallas	Information System Security	USDA/RD/O&M/DCIO/ISSS	<a href="mailto:bill.dallas@stl.usda.gov">bill.dallas@stl.usda.gov</a> (314) 457-4771
Felicia McCain	Information System Security	USDA/RD/O&M/DCIO/ISSS	<a href="mailto:felicia.williams@stl.usda.gov">felicia.williams@stl.usda.gov</a> (314) 457-4779



## Table of Contents

DOCUMENT INFORMATION .....	II
TABLE OF CONTENTS .....	III
<b>1 SYSTEM INFORMATION .....</b>	<b>1</b>
<b>2 DATA INFORMATION .....</b>	<b>5</b>
2.1 Data Collection .....	5
2.2 Data Use .....	6
2.3 Data Retention .....	8
2.4 Data Sharing .....	9
2.5 Data Access .....	9
2.6 Customer Protection .....	11
<b>3 SYSTEM OF RECORD .....</b>	<b>12</b>
<b>4 TECHNOLOGY .....</b>	<b>13</b>
<b>5 COMPLETION INSTRUCTIONS .....</b>	<b>14</b>



# 1 System Information

System Information	
Agency:	USDA Rural Development
System Name:	Guaranteed
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low



<p>Description of System:</p>	<p>Guaranteed is one of Rural Development's official accounting and financial management systems. Guaranteed consist of two subsystems <b>Lender Interactive Network Connection (LINC)</b> and <b>Guaranteed Loan System (GLS)</b>. GLS is divided into six modules which consist of <i>Guaranteed Underwriting System (GUS)</i>, <i>Farm Service Agency (FSAG)</i>, <i>Multi Family (MFGH)</i>, <i>Single Family Housing (SFH Loss)</i>, <i>Guaranteed Loan (GuarLoan)</i> and <i>Guaranteed Core</i>.</p> <p>Guaranteed is one of Rural Development's official accounting and financial management systems and supports Guaranteed and Direct Business &amp; Industry program, Guaranteed and Direct Community Facility program, Guaranteed Rural Rental Housing program, Guaranteed Single Family Housing program - including Guaranteed Single Family Housing Losses (SFH Loss), Guaranteed Water &amp; Waste program in Rural Development, and also supports Guaranteed Farm Loan Program (Guar Loan) in the Farm Service Agency (FSA) and Guaranteed Underwriting System (GUS). Guaranteed is an online transaction entry and inquiry financial and accounting system accessed by over 700 field offices, the National Office, and Finance Office. Updates are done both on-line real-time and through nightly batch processes. The field offices are the primary user of Guaranteed and the Finance Office has overall operational, financial, and accounting responsibility for Rural Development. Our external trusted partners (Lenders) provide loan status data via file uploads from a Lender Interactive Network Connection (LINC) to the mainframe during the monthly reporting periods. These files are verified for data exceptions and updated during monthly and quarterly scheduled processing timeframes. Guaranteed also has an external connection with lenders via Application Authorization Security Management (AASM). This security program resides on the Web Farm and authenticates lenders into Guaranteed via electronic authentication (eAuth). This external connection allows lenders access to the Guaranteed Loan System to process Lender Status Reports, Loan Closings, and access to the Guaranteed Underwriting System (GUS) and the Guaranteed Single Family Housing Losses (SFH Losses) applications. AASM assigns more stringent controls over external users than eAuth alone. Within AASM certain lenders (Branch Representatives) can in turn assign members within their branch access to Guaranteed. Guaranteed functions include: online inquiry and transaction input; pre-application and application processing, loan making and loan servicing transaction updates, portfolio management, lender management, daily register, balancing, and program reporting; and fiscal and financial reporting.</p> <p><b>Guaranteed Underwriting System (GUS)</b></p> <p>Guaranteed Underwriting System (GUS) is a Java J2EE application that provides a streamlined and automated application process, automated credit decision-making, and automated the eligibility determination for the SFH guaranteed rural housing loan program. The system utilizes credit agency interfaces in conjunction with a third party underwriting engine to automate the credit decision process. It includes loan origination, income &amp; property eligibility determination, underwriting (including risk determination and automated underwriting decisions), Fannie Mae credit reporting, HUD Total Scorecard, and includes recommendations for loan approval. GUS interfaces with Eligibility, MindBox, GLS, HUD, and Fannie Mae. It also provides a web user interface used to capture borrower loan application data for single family home loans guaranteed by the USDA. The system utilizes credit agency interfaces in conjunction with a third party underwriting engine to automate the credit decision process. The system is</p>
-------------------------------	--



	<p>available for Lenders to enter applications seven days a week via an E-authentication protected web site. The website internal link can be found at <a href="https://gus.sc.egov.usda.gov">https://gus.sc.egov.usda.gov</a></p> <p><b>Farm Service Agency Guaranteed (FSAG)</b></p> <p>The Farm Service Agency Guaranteed Subsystem includes applications unique to the agency program including loan origination, loan closing, losses, secondary market transactions, lender portfolio management, servicing actions, reamortizations, consolidations, transfers, agency loan repurchases, liquidation expenses, interest assistance payments, status reporting. FSAG interfaces with PLAS, Treasury and Program Funds Control System (PFCS). It can be accessed seven days a week via an E-authentication protected web site. The url internal link can be found at <a href="https://fsag.sc.egov.usda.gov">https://fsag.sc.egov.usda.gov</a>.</p> <p><b>Multi Family (MFGH)</b></p> <p>The Multi-Family Housing Guaranteed Subsystem includes applications unique to the program including loan origination, funds reservation, loan closing, losses, secondary market transactions, lender portfolio management, servicing actions, reamortizations, consolidations, transfers, agency loan repurchases, liquidation expenses, interest credit payments, status reporting. MFGH interfaces with PLAS, Treasury and PFCS and can be found at internal link <a href="https://mfhg.sc.egov.usda.gov">https://mfhg.sc.egov.usda.gov</a>.</p> <p><b>Single Family Housing (SFH Loss)</b></p> <p>The Guaranteed Loan System Single Family Housing (SFH) Automated Loss Claim functionality in GLS automates the Guaranteed SFH Loss Claims process by allowing the lender to electronically enter and transmit loss data via the Internet and to disburse loss payments to the lender via Electronic Funds Transfer (EFT). The system allows for an accurate and timely method for processing SFH Loss Claims data. The Loss Claims data captured is also used for the Debt Collection Improvement Act processing and there is an interface to the MortgageServ Fiserv Loan Servicing Platform system for this processing. There are also processing requirements for the Automated Discrepancy Processing System (ADPS) collection of SFH Loss Refunds and the GLS processing of Lender Payments that are part of the GLS system as it relates to SFH Loss Claims. SFH Loss interfaces with PLAS, Treasury, PFCS and MortgageServ Fiserv Loan Servicing Platform and is found at internal link <a href="https://sfhloss.sc.egov.usda.gov">https://sfhloss.sc.egov.usda.gov</a>.</p> <p><b>Guaranteed Loan (GuarLoan)</b></p> <p>GuarLoan includes common or shared applications used by two or more loan programs within the agency or Farm Service Agency. These include loan origination, funds reservation, loan closing, annual fees, late fees, losses, secondary market transactions, lender portfolio management, servicing actions, reamortizations, consolidations, transfers, agency loan repurchases, liquidation expenses, interest assistance payments, status reporting, and credit bureau reporting. GuarLoan interfaces with PLAS, Treasury, PFCS, MortgageServ Fiserv Loan Servicing Platform, Socio Economic Benefits Assessment System (SEBAS), Eligibility, GUS and Credit Bureaus and can be accessed at internal link <a href="https://guarloan.sc.egov.usda.gov">https://guarloan.sc.egov.usda.gov</a>.</p>
--	---



Privacy Impact Assessment for Guaranteed

	<p><b>Guaranteed Core</b></p> <p>Guaranteed Core includes loan origination, funds reservation, BP/CF facility maintenance, BP/CF project maintenance, loan closing, BP/CF servicing actions, obligations, DCIA, interest assistance, annual fees, late fees, disaster request, loss mitigation, mortgage recovery advance, BP/CF status reporting, grant determination analysis, loan consolidations, transfers, reamortizations, agency loan repurchases, BP relending programs, credit bureau reporting. Guaranteed Core interfaces with PLAS, Treasury, PFCS, MortgageServ Fiserv Loan Servicing Platform, SEBAS, Eligibility, GUS and Credit Bureaus and can be found at internal link <a href="https://qls.sc.egov.usda.gov">https://qls.sc.egov.usda.gov</a>.</p>
Who owns this system? (Name, agency, contact information)	<p>Greg Eschman USDA Rural Development 4300 Goodfellow Blvd. St. Louis, MO 63120 <a href="mailto:greg.eschman@stl.usda.gov">greg.eschman@stl.usda.gov</a> (314) 457-5057</p>
Who is the security contact for this system? (Name, agency, contact information)	<p>Eugene Texter USDA Rural Development Building 105, FC-44 4300 Goodfellow Boulevard St. Louis, MO 63120 <a href="mailto:eugene.texter@stl.usda.gov">eugene.texter@stl.usda.gov</a> (314) -457-4778</p> <p>Brenda Dinges USDA Rural Development Building 105, FC-44 4300 Goodfellow Boulevard St. Louis, MO 63120 <a href="mailto:brenda.dinges@stl.usda.gov">brenda.dinges@stl.usda.gov</a> (314) -457-4772</p>
Who completed this document? (Name, agency, contact information)	<p>Greg Eschman USDA Rural Development 4300 Goodfellow Blvd. St. Louis, MO 63120 <a href="mailto:greg.eschman@stl.usda.gov">greg.eschman@stl.usda.gov</a> (314) 457-5057</p>



## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<b>Customer Information:</b> Client names, Social Security Numbers of Borrowers, Co-Borrowers, Key Members addresses, and business financial data, debt payment information. <b>Lender Information:</b> Lender Identification Numbers, lender names, addresses and business financial data.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	Consolidated Farm and Rural Development Act (7 U.S.C. 1921 et seq); and Title V of the Housing Act of 1949 as amended (42 U.S.C. 1471 et seq)
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	
4.1	What data is being collected from the customer?	<b>Customer Information:</b> Client names, Social Security Numbers of Borrowers, Co-Borrowers, Key Members addresses, and business financial data, debt payment information. <b>Lender Information:</b> Lender Identification Numbers, lender names, addresses and business financial data.
4.2	What USDA agencies are providing data for use in the system?	USDA Rural Development provide for inputting application data.
4.3	What state and local agencies are providing data for use in the system?	No information is received from State or Local agencies.
4.4	From what other third party sources is data being collected?	FSA loan officers provide for inputting application data. Trusted lenders provide for inputting guaranteed loan application data. We receive a file of banking data form Treasury via NITC monthly.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.





No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	<p>The risk of loss, misuse, or unauthorized access to this information is low since the information is transferred to paper forms, which are printed and signed by the customer. Once the data is on hardcopy, the application data store in the system is not involved in the loan process.</p> <p>There are many balancing processes, which executes with every batch update cycle to validate data. The Deputy Chief Financial Officer (DCFO) reviews these outputs daily. These reports are for both GLS operational tables and data warehouse tables. Balancing is done against general ledger, allotment summary and check disbursement.</p>
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Same answer as 5.1
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Same answer as 5.1

## 2.2 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?	Monitor Private Sector Lenders Portfolios for loans guaranteed by USDA and provide financial information on the Guaranteed Portfolio.
7	Will the data be used for any other purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	Various calculated financial data fields will be derived and stored in GUARANTEED. The data is used to determine eligibility and for consolidated reporting purposes such as demographic data.
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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – IF NO, go to question 10.



Privacy Impact Assessment for Guaranteed

No.	Question	Response
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	The government testers and the business users/program sponsors will verify the calculated data during the testing phase of a development project. Once new processes allowing new data are implemented into production, balancing routines would also have been modified, if applicable, so the accuracy of the new data is being verified.
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?	Monitor Private Sector Lenders Portfolios for loans guaranteed by USDA and provide financial information on the guaranteed Portfolio.
11	Will the data be used for any other uses (routine or otherwise)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	Various calculated financial data fields will be derived and stored in GUARANTEED. The data is used to determine eligibility and for consolidated reporting purposes such as demographic data.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.

No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	<p>Some data is consolidated based on requirements. However, rather consolidated or not the following controls are in place to protect our data.</p> <ol style="list-style-type: none"> <li>1. The applications capability to establish access control lists (ACL) or registers is based upon the basic security setup of the operating system.</li> <li>2. Application users are restricted from accessing the operating system, other applications, or other system resources not needed in the performance of their duties via access given to User IDs limited to what is needed to perform their job.</li> <li>3. The controls used to detect unauthorized transaction attempts are security logs/audit trails.</li> <li>4. Users are required to have password-protected screensavers on their PC's to prevent unauthorized access.</li> <li>5. Warning banners are used to warn and inform users who sign on to the system that this is a secure and private network. Warning banners are in compliance with USDA guidelines.</li> <li>6. Quarterly verifications reports are produced and required to be reviewed by the responsible Point of Contact (POC) based on the organizational unit.</li> </ol>
13	Are processes being consolidated?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	NIST SP 800-53 Security Controls are discussed in detail in the System Security Plan.

## 2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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
14.2	What are the procedures for purging the data at the end of the retention period?	N/A



No.	Question	Response
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?	Reports are produced and reviewed for accuracy. Lenders are required to provide information on a monthly or quarterly basis.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## 2.4 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.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	To create and process loan applications with USDA and trusted Lenders.
17.2	Who is responsible for assuring the other agency properly uses the data?	The system owner
18	Is the data transmitted to another agency or an independent site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PI and/or Privacy Act data is appropriately protected?	Yes. GUARANTEED has connections with PLAS, Treasury, Fannie Mae, HUD, and NFC through TDW. Treasury is interfacing with NITC- GLS through NITC. GLS does directly interface with Treasury. The RD Information System Security Staff (ISSS) maintain the Interconnection Service Agreements.
19	Is the system operated in more than one site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	Any GLS components/data that are in Web Farm are balanced between the sites.

## 2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	USDA RD and FSA GUARANTEED system users and managers, GUARANTEED Systems Administrators, and GUARANTEED Trusted Lenders.



Privacy Impact Assessment for Guaranteed

No.	Question	Response
21	How will user access to the data be determined?	The RD ISSS Point of Contact (POC) is responsible for verifying user identification. The RD ISSS User Access Management Team (UAMT) relies on the POC supplying the correct user roles, privileges, and areas of responsibility (e.g. State office user with authority for their state only) to be assigned to each user. The UAMT creates the accounts and the users and their assigned roles are verified quarterly by the POC. Logbook tickets are the tool used to track authorized requests by approving POC.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	<ol style="list-style-type: none"><li>1. The applications capability to establish access control lists (ACL) or registers is by based upon the basic security setup of the operating system.</li><li>2. Application users are restricted from accessing the operating system, other applications, or other system resources not needed in the performance of their duties via access given to User IDs limited to what is needed to perform their job.</li><li>3. Any controls used to detect unauthorized transaction attempts are security logs/audit trails through ACF2 tools.</li><li>4. Users are required to have password-protected screensavers on their PC's to prevent unauthorized access.</li><li>5. Warning banners are used to warn and inform users who sign on to the system that this is a secure and private network. Warning banners are in compliance with USDA guidelines.</li><li>6. See also #21.</li></ol>
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



## 2.6 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.)?	The System/Application Owner
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:  Andrea Jenkins Freedom of Information Officer Rural Development, USDA 7th Floor, Reporter's Bldg. Washington, DC 20250 <a href="mailto:Andrea.Jenkins@wdc.usda.gov">Andrea.Jenkins@wdc.usda.gov</a> (202) 692-0029
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?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> 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: <ul style="list-style-type: none"><li>▪ Consolidation and linkage of files and systems</li><li>▪ Derivation of data</li><li>▪ Accelerated information processing and decision making</li><li>▪ Use of new technologies</li></ul> Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	N/A



No.	Question	Response
28	How will the system and its use ensure equitable treatment of customers?	<p><u>DM 3515-002, section e states:</u></p> <p>To fulfill the commitment of the USDA to protect customer and employee data, several issues must be addressed with respect to privacy:</p> <ol style="list-style-type: none"> <li>1. The use of information must be controlled; and</li> <li>2. Information may be used only for a necessary and lawful purpose.</li> </ol> <p>Where Public Affairs systems of records are involved:</p> <ol style="list-style-type: none"> <li>1. Individuals must be informed in writing of the principal purpose and routine uses of the information being collected from them;</li> <li>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</li> <li>3. Any information used must be sufficiently accurate, relevant, timely, and complete to assure fair treatment of the individual.</li> </ol> <p>Also, <u>P.L. 95-454, the Civil Service Reform Act of 1978</u> which is enforced by The U.S. Equal Employment Opportunity Commission (EEOC) ensures the equitable treatment of the employees.</p>
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	N/A

### 3 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31



No.	Question	Response
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 retrieved by GUARANTEED authorized users through login IDs using ACF2 IDs which are verified on the NITC Mainframe. The personal identifier, borrower case number, retrieves it. The user inputs borrower case number that is converted to a unique identifier assigned by GLS.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)	DOCID:agri_003-27; SOR Notice USDA/RURAL DEVELOPMENT – 1; No date available
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes (Depends on the elements changed) <input type="checkbox"/> No

## 4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	N/A





## 5 Completion Instructions

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 FOR CYBER SECURITY.

## Privacy Impact Assessment Authorization


### Memorandum

I have carefully assessed the Privacy Impact Assessment for

Guaranteed

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

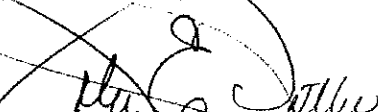
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

  
\_\_\_\_\_  
Greg Eschman - System Manager/Owner

7/16/09  
Date

  
\_\_\_\_\_  
Brenda Dinges - Agency's Chief FOIA Officer

8/10/09  
Date

  
\_\_\_\_\_  
John Distler - Agency DCIO

8/11/09  
Date