



Privacy Impact Assessment

Packers and Stockyards Automated System (PSAS)

**Grain Inspection, Packers and
Stockyards Administration (GIPSA)**

Date: July 1, 2009



Document Information

Owner Details	
Name	Grain Inspection, Packers and Stockyards Administration Packers and Stockyards Program
Contact Number	Alan R. Christian, Deputy Administrator, P&SP, 202-720-7051 Regina Ware, System Administrator, 202-205-9742 Gayle Pounds-Barnett, Assistant System Administrator, 515-323-2541 Kathy Anderson, Enterprise Technologies, Rural Development, 314-457-5012
E-mail Address	Alan.R.Christian@usda.gov Regina.R.Ware@usda.gov Gayle.L.Barnett@usda.gov Kathy.Anderson@stl.usda.gov

Revision History			
Revision	Date	Author	Comments

Distribution List			
Name	Title	Agency/Office	Contact Information



Table of Contents

DOCUMENT INFORMATION.....	ii
TABLE OF CONTENTS	iii
1 SYSTEM INFORMATION.....	1
2 DATA INFORMATION.....	3
2.1 Data Collection	3
2.2 Data Use	5
2.3 Data Retention	7
2.4 Data Sharing.....	7
2.5 Data Access	8
2.6 Customer Protection	9
3 SYSTEM OF RECORD.....	11
4 TECHNOLOGY	11



1 System Information

System Information	
Agency:	Grain Inspection, Packers and Stockyards Administration (GIPSA)
System Name:	Packers and Stockyards Automated System (PSAS)
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
Description of System:	<p>GIPSA's Packers and Stockyards Automated System (PSAS) was developed in response to the need for an integrated system to eliminate multiple data entry and to ensure accurate data for reporting and management. PSAS strengthens the Packers and Stockyards Program's (P&SP) ability to track major milestones of its core business processes.</p> <p>P&SP has a Memorandum of Understanding with USDA's Rural Development (RD) to support the development, implementation, and maintenance of PSAS. RD selected USDA's Enterprise Content Management (ECM) as the preferred platform for PSAS. PSAS is comprised of two components—ECM and Account Management System (AMS). ECM is the heart of the system. It manages the business processes' work flows and the documents that are generated as a result of those processes. The AMS component stores and manages all data related to business entities, investigations, and regulatory activities; supports queries, generates batch letters, and facilitates reporting requirements.</p>
Who owns this system? (Name, agency, contact information)	<p>Alan R. Christian, Deputy Administrator Packers and Stockyards Program, GIPSA 202-720-7051 Alan.R.Christian@usda.gov</p> <p>Regina Ware, System Administrator 202-205-9742 Regina.R.Ware@usda.gov</p> <p>Gayle Pounds-Barnett, Assistant System Administrator 515-323-2541 Gayle.L.Barnett@usda.gov</p>
Who is the security contact for this system? (Name, agency, contact information)	<p>Kathy Anderson, Branch Chief Enterprise Technologies USDA Rural Development 314-457-5012 Kathy.Anderson@stl.usda.gov</p>



PIA for Packers and Stockyards Automated System (PSAS)

Who completed this document? (Name, agency, contact information)	Joanne C. Peterson, Privacy Act Officer GIPSA, Management Support Staff 202-720-8087 Joanne.C.Peterson@usda.gov
--	--



2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>P&SP collects personal and business information from individuals who are registered under the Packers and Stockyards Act (P&S Act) to conduct business in the livestock, meat, and poultry industries. The following information is contained in the system: names; trade names; mailing and operating addresses; telephone numbers; types of livestock handled; character of business; ownership information; names and locations of posted stockyards, auction markets, and feedlots; web sites where they will operate; and custodial account numbers (for market agencies selling on commission).</p> <p>In addition to the above information, PSAS integrates case file management, data monitoring, and reporting into a single secure, closed system. PSAS is comprised of two components—Enterprise Content Management (ECM) and Account Management System (AMS). The ECM component manages the work flows developed from the core processes and the documents that are generated as part of those processes. The AMS component stores and manages regulated entity business data, supports queries, generates batch letters, and provides reporting capabilities.</p>
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
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



PIA for Packers and Stockyards Automated System (PSAS)

No.	Question	Response
4	Sources of the data in the system.	Information is obtained (1) from individuals who register under the P&S Act to conduct business in the livestock, meat, and poultry industries; (2) from individuals and businesses who file claims against registrants; and (3) by GIPSA employees who collect it during the course of their official responsibilities.
4.1	What data is being collected from the customer?	<p>Name, trade name, mailing and operating address, telephone numbers, type of livestock handled, character of business, ownership information, name and location of posted stockyards, auction markets, feedlots, web sites where they will operate, and custodial account numbers (for market agencies selling on commission).</p> <p>Packers, market agencies, or dealers apply for a surety bond to meet the bonding requirements of the Packers and Stockyards Act. Information provided includes bond number, principal name and address, surety name and address, condition of the bond, and power of attorney.</p> <p>Certain producers and growers file trust claims against packers and live poultry dealers for delayed or nonpayment for livestock and poultry transactions. Information provided includes name and address of claimant, name and address of respondent, date of transaction, amount claimed, name and address where transaction occurred, description of transaction, terms of contract, supporting documentation, and evidence.</p>
4.2	What USDA agencies are providing data for use in the system?	No other USDA agency provides "data" for use in PSAS.
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?	In addition to those mentioned in 4.1 above, GIPSA obtains information from financial institutions, attorneys, accountants, and insurance companies, which P&SP personnel may enter into PSAS.
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.



PIA for Packers and Stockyards Automated System (PSAS)

No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	<p>P&SP's Central Reporting Unit (CRU) is responsible for the program's annual reporting activities.</p> <p>When a report is received, the CRU staff scans, indexes, and routes the report for processing after performing a preliminary review to check for completeness, signature, and overall acceptability. As part of the automated analysis, deficiencies will be identified. If there are no deficiencies, the annual report is considered complete. If deficiencies are found, the CRU staff notifies the affected regional office unit supervisor to initiate the appropriate regulatory activity. The regional office will complete the regulatory activity and update the annual report database.</p> <p>P&SP conducts compliance reviews, financial audits, investigations, and monitoring programs to enforce the P&S Act's business practice provisions, competition, and financial provisions. Through these investigative and monitoring activities, P&SP personnel can verify the information customers provide us.</p>
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	P&SP employees collect information in the course of performing their duties and that information is entered in PSAS. Supervisory personnel verify the information for accuracy, relevance, timeliness, and completeness.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	<p>P&SP's CRU verifies the data as it is received.</p> <p>P&SP employees also verify the data collected during the course of conducting P&SP compliance reviews, financial audits, investigations, and monitoring programs.</p>

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?	To assure fair competition and fair trade practices, to safeguard farmers and ranchers, to protect consumers, and to protect members of the livestock, meat, and poultry industries from unfair, deceptive, unjustly discriminatory and monopolistic practices.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.



PIA for Packers and Stockyards Automated System (PSAS)

No.	Question	Response
7.1	What are the other purposes?	
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	The information collected and maintained in PSAS is used to administer the registration provisions under the P&S Act, to adjudicate contract disputes, and to enforce the P&S Act and regulations issued thereunder.
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	N/A



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?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
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 retained permanently.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" 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?	



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.)?	P&SP personnel at all organizational levels; P&SP system administrator (SA) and assistant SA; Trade Practices Division, Office of the General Counsel; USDA's Rural Development Enterprise Technologies; contractors from Qflow for workflow development and support, and from Unisys for Account Management System application development and support. Production data access for contractors is read-only and used only to help understand and resolve reported application issues and defects.
21	How will user access to the data be determined?	Privileges granted via Roles which are based on job functions and area of authority (e.g., in AMS, the Financial Agent Role is the only role that can add, update or delete financial instruments such as Bonds, Trust Agreements and Letters of Credit; in ECM access to Folders are protected by Region). User Ids are handled by the USDA eAuthentication group that processes the requests. As for Role-based access, the P&SP authorized Role Administrator uses USDA eAuthentication CA IdentityMinder to fulfill this obligation.
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?	PSAS data access is restricted to those with eAuthentication Level 2 access and need-to-know based on the determination of the P&SP Role Administrator.
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.)?	Kathy Anderson Project Manager 4300 Goodfellow Blvd. St. Louis, Missouri 63120 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?	Joanne Peterson, GIPSA PA Officer 1400 Independence Avenue, SW, Room 1640 Washington, D.C. 20250 202-720-8087 Joanne.C.Peterson@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?	<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.	
27	Consider the following: <ul style="list-style-type: none"> ▪ 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	



PIA for Packers and Stockyards Automated System (PSAS)

No.	Question	Response
28	How will the system and its use ensure equitable treatment of customers?	<p>DM 3515-002 section e states: 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.</p> <p>Where PA 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.</p> <p>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.</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	



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
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>Names of individuals who are registered under the P&S Act to conduct business in the livestock, meat, and poultry industries.</p> <p>Names of Individuals who have filed claims against registrants.</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 .)	<p>USDA/P&SA-2 initially established as "Persons Engaged in Business as Livestock Market Agencies and Dealers under the Provisions of the Packers and Stockyards Act, USDA/P&SA" will be re-titled "Packers and Stockyards Automated System (PSAS)".</p> <p>GIPSA cannot find the publication date of initially established USDA/P&SA-2 but believes it was created in the late 1970s-early 1980s.</p>
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>USDA/P&SA-2 is being modified; YES, the SOR is being revised and the SOR name also will change.</p>

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?	




Privacy Impact Assessment Authorization

I have carefully assessed the Privacy Impact Assessment for GIPSA's **Packers and Stockyards Automated System (PSAS)**. 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.


Joanne C. Peterson, GIPSA Privacy Act Officer

7-1-09
Date


R. Dexter Thomas, Supervisory Regulatory Analyst
Management Support Staff (MSS)

7/1/09
Date


Marianne Plaus, Acting Director, MSS-GIPSA


7/5/09
Date


Kathy Anderson, Branch Chief, Enterprise Technologies
USDA Rural Development


7/8/09
Date


Regina Ware, PSAS System Administrator


7/13/09
Date


Alan R. Christian, Deputy Administrator
Packers and Stockyards Program, GIPSA

7/20/09
Date


Brian Hughes, ISSPM, Information Technology Staff, GIPSA

7/28/09
Date


Frieda Achtentuch, Chief Information Officer, GIPSA

7-29-09
Date