



# **Privacy Impact Assessment**

**Electronic Disqualified Recipient system (eDRS)**

**Revision: 1.1**

**Food and Nutrition Service – FNS**

**Date: April 2010**



## Document Information

Owner Details	
Name	Karen Walker
Contact Number	703.305.2413
E-mail Address	<a href="mailto:Karen.Walker@fns.usda.gov">Karen.Walker@fns.usda.gov</a>

Revision History			
Revision	Date	Author	Comments
1.0	8/24/09	John Coulter	New template and updates of contacts
1.1	4/15/2010	John Coulter	Update and review

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 .....	2
2.1 Data Collection .....	2
2.2 Data Use.....	3
2.3 Data Retention .....	4
2.4 Data Sharing.....	4
2.5 Data Access .....	5
2.6 Customer Protection.....	6
3 SYSTEM OF RECORD.....	6
4 TECHNOLOGY .....	7
5 COMPLETION INSTRUCTIONS.....	8



# 1 System Information

System Information	
Agency:	Food and Nutrition Service
System Name:	eDRS
System Type:	<input type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input checked="" 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:	A national internet based application that tracks Supplemental Nutrition Assistance Program (SNAP) participants that have been found guilty of Intentional Program Violations (IPVs). The system is supplied with records by states and referenced for nationwide compliance for program benefits and penalty determination.
Who owns this system? (Name, agency, contact information)	Karen Walker USDA/FNS/Program Accuracy Division 703-305-2413, <a href="mailto:Karen.Walker@fns.usda.gov">Karen.Walker@fns.usda.gov</a>
Who is the security contact for this system? (Name, agency, contact information)	STEPHANIE MEANS USDA/FNS/OIT/Security/ISSM (312) 353-7270 <a href="mailto:Stephanie.Means@fns.usda.gov">Stephanie.Means@fns.usda.gov</a>
Who completed this document? (Name, agency, contact information)	John Coulter USDA/FNS/OIT/PMO/PMB 612-370-3354 <a href="mailto:John.Coulter@fns.usda.gov">John.Coulter@fns.usda.gov</a>

## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	eDRS collects name, Date of Birth, sex, and social security numbers of SNAP participants who have Intentional Program Violations (IPVs).
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.	USDA/FNS-5 – Information on Persons Disqualified from the SNAP.
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.	State agencies
4.1	What data is being collected from the customer?	State agencies supply the name, Date of Birth, sex, and social security numbers of SNAP participants who have Intentional Program Violations (IPVs).
4.2	What USDA agencies are providing data for use in the system?	FNS only
4.3	What state and local agencies are providing data for use in the system?	State agencies that handle SNAP participants
4.4	From what other third party sources is data being collected?	None
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.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	N/A. No data is received directly from customers.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A – FNS does not supply data to the system.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	State agencies are the ones who supply and verify for accuracy, relevance, timeliness and completeness of data. FNS does verify the completeness and basic checks on the data types to ensure they are correct.



## 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?	States use this information to determine if a participant has been disqualified from a different state and if they are eligible to receive benefits.
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.
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 checked="" type="checkbox"/> Yes <input 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 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	N/A – FNS does not add any new data.
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?	State agencies collect the information and then enter it into eDRS.
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?	
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?	Access to privacy information is strictly controlled by role based log-in information. In addition data is encrypted in transit.
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?	

### 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?	States are responsible for making this determination and evaluation. They are given tools that allow them to download and verify the data.
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?	States use this information to determine if a participant has been disqualified from a different state and if they are eligible to receive benefits.



No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	States are the creators of the data. Access to the system is controlled by FNS through the authorization process.
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 PII and/or Privacy Act data is appropriately protected?	The eDRS system is not hosted within FNS. There are interconnection agreements covering security and privacy concerns.
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.)?	Access is limited to FNS staff and managers responsible for SNAP participant accuracy and applications.  In addition, State Agencies use this information to determine if a participant has been disqualified from a different state and if they are eligible to receive benefits.  USDA and FNS employees in general do not have access. eDRS access is strictly limited to those who have an approval and need to know.
21	How will user access to the data be determined?	Need to know. Access and access controls are documented.
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?	Users are restricted to their areas of assigned responsibilities.
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.)?	Karen Walker, Food and Nutrition Service Program Accuracy Division (PAD) 703-305-2413
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	They can contact their local field or regional office.
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"> <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?	
28	How will the system and its use ensure equitable treatment of customers?	By use of SSN we ensure equitable treatment.
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



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.)?	Social Security Number
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> .)	USDA/FNS-5 – Information on Persons Disqualified from the SNAP.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" 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?	

## 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 the

\_\_\_\_ Electronic Disqualified Recipient System (eDRS) \_\_\_\_\_  
(System Name)

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.

\_\_\_\_\_  
System Manager/Owner  
OR Project Representative  
OR Program/Office Head.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency's Chief FOIA officer  
OR Senior Official for Privacy  
OR Designated privacy person

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency OCIO

\_\_\_\_\_  
Date

