



# **Privacy Impact Assessment (PIA)**

## **Payment Systems (Payment) Check Accounting System (CAS)**

**Revision: Final**

**Farm Service Agency**



***Date: March 23, 2010***



## Document Information

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Document Revision and History			
Revision	Date	Author	Comments
	07/15/08	Thomas Cranwill	
1.01	11/26/2008	S. Timbrook ECS	Updated original document to new 2009 template.
1.02	07/21/09	T. Ostrander	Renamed, Changed date in footer. Verified owner and security owner.
1.03	7/28/09	Brad Schuman	Updated.
1.04	7/28/09	D.Brizendine	Updated responses for 24, 25, 26, 26.1; document review
1.05	7/31/09	D.Brizendine	Updated response for 2.1, 30.2; document review; template updates
1.06	8/10/2009	D.Brizendine	Updated response for 7, 7.1, 11, 11.1 and changed wording on 71.2
1.07	9/1/09	D.Brizendine FSAISO	Updated response for 5, 6, 10, 12.1, 16, 21, 22, 28, 30, 30.1,30.2 from John Underwood's email.
1.08	9/8/09	D.Brizendine FSAISO	After talking to Brad Schuman about the questions from John Underwood updates were made to 4, 4.2, 4.4, 5.1, 5.3, 17, 17.1, 17.2, 30, 30.1, 30.2 and 30.3.
Final	9/25/09	D.Brizendine FSAISO	Added completed Approval page and marked document as Final.
1.09	03/04/2010	S. Timbrook, ECS	Reviewed and update from baseline 2010, uploaded for review and update by Brad Schuman.
	03/23/2010	S. Timbrook, ECS	Finalized, released for signatures.
Final	04/08/2010	S. Timbrook, ECS	Updated responses to 14, 14.1, 14.2, 14.3, 15 from John Underwood's email. Changed business owner to Jim McAfee from A. Sieg.



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# 1 Purpose of Document

USDA DM 35 15-002 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 **Payment System (Payment) - Check Accounting System (CAS)** 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	
Agency:	Farm Service Agency
System Name:	Payment System (Payment) - Check Accounting System (CAS)
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	<p>The Check Accounting System (CAS) was established to account for disbursements made on behalf of FSA and CCC by CCC-184 or CCC-374. CAS obtains information from five external systems: SCOAP, PCIMS, GIMS, CDS, and the Federal Reserve Bank (FRB) paid checks. CAS is used in the reconciliation of check activity for the agency. CAS tracks activity by check number and daily reports any exceptions to normal processing. The primary functions of CAS are:</p> <ol style="list-style-type: none"> <li>1) Assist with the daily reconciliation of cash,</li> <li>2) Track activity for disbursements made by check,</li> <li>3) Report exceptions to normal processing of check disbursements</li> <li>4) Report on a daily basis any "Unmatched Paid" activity.</li> </ol> <p>In support of the above functions CAS consists of a COBOL/IDMS "Batch" system, an IDMS database, and a MS-ACCESS user interface. The latest version of MS ACCESS and a shortcut pointing to CUIS must be available on the users' desk tops for the CUIS system to run.</p> <p><b>The mission of CAS is to help the internal employees reconcile the exceptions</b></p>
Who owns this system? (Name, agency, contact information) Information Owner.	<p>Angela Sieg Office Chief, Administrative and Financial Application Office (AFAO) U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133 816) 926-1568 <a href="mailto:Angela.Sieg@kcc.usda.gov">Angela.Sieg@kcc.usda.gov</a></p>



Privacy Impact Assessment for  
Payment System (Payment) - Check Accounting System (CAS)



Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (IS SPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 <a href="mailto:brian.davies@wdc.usda.gov">brian.davies@wdc.usda.gov</a>
Who completed this document? (Name, agency, contact information)	Shahara Timbrook, ECS  1500 E. Bannister Road Kansas City, MO 64131  (816) 823-5823



### 3 Data Information

#### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Name, address, and payment information about the payment(s) made to the customer who could be a farmer/vendor, etc.
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-SCOAP, PCIMS, GIMS, CDS, Federal Reserve Bank (FRB)
4.1	What data is being collected from the customer?	Payment information including check numbers and the amount of checks. The Federal Reserve file includes SSN/TIN information. The FMS SCOAP file includes the producer’s payment information after the producer is certified by the field office.
4.2	What USDA agencies are providing data for use in the system?	Farm Service Agency
4.3	What state and local agencies are providing data for use in the system?	N/A
4.4	From what other third party sources is data being collected?	Federal Reserve Bank (FRB)
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?	Program data is reviewed for accuracy, relevancy, timeliness, and completeness when any updates are made.



No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Program data is reviewed for accuracy, relevancy, timeliness, and completeness when any updates are made.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Program data is reviewed for accuracy, relevancy, timeliness, and completeness when any updates are made.

### 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?	Program payment check reconciliation.
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.
9.1	Will the new data be placed in the individual’s record (customer or employee)?	Yes
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?	Program payment check reconciliation.





No.	Question	Response
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
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?	Fairness in making determinations is assured because policy requires that the information be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Ye 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?	Memorandum of Understanding (MOU) between Commodity Credit Corporation and U.S. Department of Treasury, dated 06/10/09.
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.)?	Users, managers, system administrators, developers, etc.
21	How will user access to the data be determined?	Following standard agency procedures, job function and role are key factors in granting access. Once approved, access is restricted by user ID and password.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes No
22	How will user access to the data be restricted?	By system security which requires that access be restricted by user ID and password.
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.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at <a href="mailto:john.underwood@kcc.usda.gov">john.underwood@kcc.usda.gov</a> & 816.926.6992
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 standardized method of performing payment transaction reconciliation.
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.)?	Producer name and SSN/TIN retrieved by check 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/FSA-2, Farm Records File (Automated)
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes

## 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?	N/A



## **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.



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Check Accounting System (CAS)



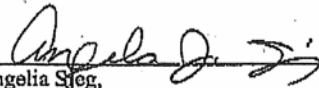
**Privacy Impact Assessment Authorization  
Memorandum**

I have carefully assessed the Privacy Impact Assessment for the  
**Payment Systems (Payment)- Check Accounting System (CAS)**

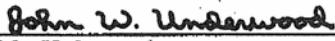
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This document has been completed in accordance with the requirements of the E-Government Act of 2002.

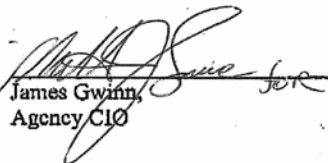
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

  
\_\_\_\_\_  
Angelia Sjog,  
System Manager/Owner

3/25/10  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
John Underwood,  
Agency's Chief FOIA officer

4/8/10  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
James Gwinn,  
Agency CIO

4/15/2010  
\_\_\_\_\_  
Date