USDA

Privacy Impact Assessment

Direct Loan System (DLS)

- Loan Making (LM)
- **Loan Servicing System (LS)**
  - o Classification Review (CR)
    - o Farm Visit (FV)
    - o Graduation Review (GR)
  - o Limited Resource Review (LR)
    - o Security Instruments (SI)
      - ▪ Real Estate
      - ▪ Mortgage
      - ▪ Other
  - o Year End Analysis (YA)

FSA
FARM SERVICE AGENCY

Document Information

<table>
<tr><th colspan="2">Owner Details</th></tr>
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<table>
<tr><th colspan="4">Document Revision and History</th></tr>
<tr><th>Revision</th><th>Date</th><th>Author</th><th>Comments</th></tr>
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<tr><td>V.6</td><td>02/18/2009</td><td>S. Timbrook, ECS</td><td>Corrected Karen Malkin title and returned for signature.</td></tr>
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<tr><td></td><td>02/23/2009</td><td>Judy Cain, IT Specialist</td><td>Revised responses per email for sections #19,21,4.2,24</td></tr>
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<tr><td></td><td>06/29/2009</td><td>John Underwood</td><td>Made changes from the original in block 24 and 25 of the 2.6 Customer Protection section and block 30.2 of the 3. System of Record section.</td></tr>
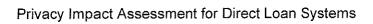<tr><td>Final</td><td>06/30/2009</td><td>S. Timbrook, ECS</td><td>Marked final, signatures received</td></tr>
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1 Purpose of Document

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 **Direct Loan System (DLS)** 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:	Direct Loan Systems (DLS-LM/LS)
System Type:	X Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High X Moderate ☐ Low
Description of System:	The Direct Loan System is a web-based application that provides field offices with the ability to process loan applications using the Loan Making application and service loans using the Loan Servicing application. DLS consists of two major applications/systems. These are 1) Loan Making (LM) and 2) Loan Servicing (LS). They interface through the ADPS subsystem in the Program Loan Accounting System (PLAS) on the mainframe to process the financial aspects of creating, obligating, and maintaining Direct Loans to borrowers.
Who owns this system? (Name, agency, contact information)	Todd Burke Farm Credit Applications Office (FCAO) U.S. Department of Agriculture Farm Service Agency 4300 Goodfellow Blvd. St. Louis, MO 63120 314-539-7239 todd.burke@stl.usda.gov
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov
Who completed this document? (Name, agency, contact information)	Rob R. Smith FCAO 6501 Beacon Drive Kansas City, MO 64133 816.926.1506 rob.smith@kcc.usda.gov

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	The Loan Servicing System provides field offices with the ability to maintain loans. Customer-Name, Social Security Number, Financial Information, Loan Information, Farm production information, Liabilities, assets owned, tax id.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	X Yes ☐ No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	7 U.S.C. 135b, 450j, 450k, 4051, 1281-1393, 1421-1449, 1461-1469, 1471-1471i, 1781-1787; 15 U.S.C. 714-714p; 16 U.S.C. 590a-590q, 1301-1311, 1501-1510, 1606, 2101-2111, 2201-2205, 3501, 3801-3847, 4601, 5822; 26 U.S.C. 6109; 40 U.S.C. App. 1, 2, 203; 43 U.S.C. 1592; and 48 U.S.C. 1469
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.	X Yes ☐ No
4	Sources of the data in the system.	Service Center Information Management System (SCIMS), Farm Business Plan (FBP), Master Reference Tables (MRT), Appraisal System COTS (Appraisal) Program Loan Accounting System (PLAS), Automated Discrepancy Processing System (ADPS)
4.1	What data is being collected from the customer?	None within DLS,
4.2	What USDA agencies are providing data for use in the system?	FSA Direct Loan Servicing, Service Center Information Management System (SCIMS), Farm Business Plan (FBP), Appraisal System (Appraisal)
4.3	What state and local agencies are providing data for use in the system?	County offices, Tax records, Courthouse Records (UCC filings), Deed Recorder
4.4	From what other third party sources is data being collected?	Other lenders, credit reporting agencies, private appraisers, Crop insurance companies, multi list data, Farm Credit System, sales data. Ag Lenders, business owners.
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 X 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?	N/A
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A
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?	The Loan Servicing System collects information about individuals to maintain loans.
7	Will the data be used for any other purpose?	X Yes ☐ No – If NO, go to question 8.
7.1	What are the other purposes?	The data may be used for reporting 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	X 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.)?	X Yes ☐ No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	X Yes ☐ No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes X No
9.3	How will the new data be verified for relevance and accuracy?	All data is entered via the agencies users. Users have manual processes in place to ensure the accuracy of the data being entered into the system. Spot check, audits, manual verification, system tested calculations, system edits.
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 collected information will be used to process loan applications and service existing loan customer inquiries.

No.	Question	Response
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes X 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 X 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?	X Yes ☐ No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	All entry into the system is controlled by eAuthentification (eAuth), Extensible Authentication System (EAS) and resides behind the Kansas City Web Farm Firewall.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	☐ Yes X No – If NO, go to question 15. Data is stored indefinitely.
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?	DLS utilizes automated workflows, reminders, and checklists to determine the activities and timing of activities required to create and service loan.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	X 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 X 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 (PLAS) ☐ 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?	Yes
19	Is the system operated in more than one site?	☒ Yes all FSA field offices ☐ No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	Access is determined by user ID and password, following standard agency procedures. Role based access is built in. For web-based applications, patches or fixes are done to the main program so anyone accessing the site will see the update. The web program and database are in a central location so updates would affect all at the same time.

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.)?	System Administrators, field sites, and the national office will have access to the data within the system.
21	How will user access to the data be determined?	Initial authentication of users occurs through the USDA eAuthentication (eAuth) mechanism for access to USDA web applications. To access Direct Loan system higher level employee-only, Level II eAuth access privileges are required. Secondary authentication is also necessary as the application requires privileges assigned by user access roles defined in the FSA Extensible Authentication system (EAS).
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	X Yes ☐ No

No.	Question	Response
22	How will user access to the data be restricted?	With DLS (LM/LS), the operating system implements discretionary access control through an access control methodology referred to as "roles and view." Discretionary access control as implemented by roles and views supports the concept of need-to-know.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	X Yes ☐ No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	X Yes, the DLS system employs e-authentication and application role-based security. ☐ No

3.6 Customer Protection

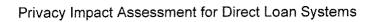| No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	Production Adjustment and Risk Management Office and John W. Underwood, FSA Privacy Act Officer / FSA PII 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 John W. Underwood FSA Privacy Act Officer / FSA PII Officer USDA - Farm Service Agency Beacon Facility - Mail Stop 8388 9240 Troost Avenue Kansas City, Missouri 64131-3055 Phone: 816-926-6992 Cell: 816-564-8938 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. X No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	Following standard FSA Breach notification policy

No.	Question	Response
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 X 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?	FSA guidelines for fair and equitable treatment already exist. Automated consideration or uniform calculations of all available options.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes X 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?	X 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.)?	core_customer_identifier and/or farm_loan_customer_identifier will be used to retrieve data.
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 USDA/FSA-14 – Applicant/Borrower
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes X 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 X 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-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

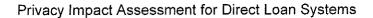Direct Loan System (DLS), Loan Making (LM), Loan Servicing System (LS)

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.

Todd D. Burke
System Manager/Owner

19 Mar 09
Date

~~Karen P. Malkin~~ John W. Underwood
~~Assistant to the Administrator and Chief Privacy Officer~~
FSA Privacy Act Officer

6/29/09
Date

James Gwinn
Agency CIO

3/19/09
Date

Privacy Impact Assessment Authorization

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_____   _____
Todd Burke   Date
System Manager/Owner

_____   _____
John W. Underwood   Date
FSA Privacy Act Officer

_____   _____
James Gwinn
Agency CIO   Date