



Privacy Impact Assessment
(PIA)
Acreage Reporting and Compliance Systems
(ARCS)
HELIC Violation Application (HELIC)

Revision: *1.01*



Farm Service Agency

Date: *May 14, 2010*



Privacy Impact Assessment for
HELIC Violation Application (HELIC)



Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	May 14, 2010	Anita Trader, ISO DR	Initial version for 2010 populated from 2009 PIA
1.02	June 16, 2010	Judy Sobbing, ECS	Review and Update with standard responses
	July 2, 2010	C. Niffen	Changes made per John Underwood on questions 4.4, 6, 10, 26

Privacy Impact Assessment for
HELC Violation Application (HELC)

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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 ARCS FISMA Child: **HELC Violation Application** 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

System Information	
Agency:	Farm Service Agency.
System Name:	HELC Violation Application.
System Type:	Major Application
	General Support System
	Non-major Application
System Categorization (per FIPS 199):	High
	Moderate
	Low
Description of System:	<p>This Farm Service Agency website is provided to review Highly Erodible Land Conservation and Wetland Conservation violation data, and provide various reports about reported violations. This system provides the capability to record violation data that is collected on form FSA-493 which is submitted by County Service Centers to State Service Centers. The HELC application allows County offices to track/report on violators of the following act: The Food Security Act of 1985, as amended by the Food, Agriculture, Conservation and Trade Act of 1990, and the Federal Agricultural Improvement Act of 1996, discourages the production of crops on highly erodible cropland unless the land is protected from erosion by an approved conservation system. Status reviews are conducted to ensure producers follow a conservation plan on highly erodible land. In addition to the highly erodible land, a person may not plant an agricultural commodity on wetland converted after December 23, 1985 or convert a wetland to make agricultural production possible after November 28, 1990. Noncompliance with these provisions results in a person being ineligible for USDA benefits. County Committees may review noncompliance situations for good faith and provide relief in approved cases.</p>

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Who owns this system? (Name, agency, contact information)	Jennifer Thomas PARMO 6501 Beacon Drive Kansas City MO 64133 (816) 926-1454 Jennifer.Thomas@kcc.usda.gov
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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)	Paula Hahn PARMO 6501 Beacon Drive Kansas City MO 64133 (816) 926-2103 paula.hahn@kcc.usda.gov

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Producer data is used by the customer in association with farm and crop information being reported and acted upon throughout the compliance systems. Specifically, a producer's ID, ID type, and entity type, as well as any associated farm numbers are used as key information.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<p>Yes</p> <hr/> <p>No – If NO. go to question 3.</p>
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
4	Sources of the data in the system.	Name and address, farm and tract, farm producer, GIS, and crop files are all sources of information, as well as information provided by aerial photography, farm inspections, and the producers themselves. Other than internal FSA data, the APFO (Aerial Photography Field Office) provides aerial maps of land to be used in acreage reporting and compliance activities.
4.1	What data is being collected from the customer?	A producer's/customer's tax ID, ID type, and entity type, as well as any associated farm numbers are used as key information in these systems. The customer provides either their name or tax ID to initiate a transaction, and from there may go on to provide crop and/or commodity information, as well as associated acreages, by farm, tract, and field. Customer provided crop data includes crop, crop type, irrigation practice, intended use, etc.
4.2	What USDA agencies are providing data for use in the system?	Farm Service Agency.

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No.	Question	Response
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?	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.	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?	Data collected from customers is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data collected from USDA sources is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.
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?	To track and report violation data that is collected on form FSA-493, review Highly Erodible Land Conservation and Wetland Conservation violation data, ensure producers follow the conservation plan on Highly Erodible Land, and provide various reports about reported violations
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.

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No.	Question	Response
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 s
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	Yes s No
9.3	How will the new data be verified for relevance and accuracy?	Data collected from customers is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.
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?	To track and report violation data that is collected on form FSA-493, review Highly Erodible Land Conservation and Wetland Conservation violation data, ensure producers follow the conservation plan on Highly Erodible Land, and provide various reports about reported violations
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.

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No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	Security Identification and Authentication is enforced on all platforms (MF: ACF2, Web: eAuth, AS/400 S36: OS/400 and SSP, UNIX: Sun Solaris and Hyperion). In addition, all platforms offer further Authorization mechanisms (MF:DB2, Web: EAS and SQL, AS/400 S36: DB2 and S36 Partitions and locations, UNIX: Informix).
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?	Security Identification and Authentication is enforced on all platforms (MF: ACF2, Web: eAuth, AS/400 S36: OS/400 and SSP, UNIX: Sun Solaris and Hyperion). In addition, all platforms offer further Authorization mechanisms (MF:DB2, Web: EAS and SQL, AS/400 S36: DB2 and S36 Partitions and locations, UNIX: Informix).

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?	Customer information is reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and 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?	Yes
		No

3.4 Data Sharing

Question	Response
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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?	NASS uses summarized crop and acreage data for statistical surveys and projections. RMA uses detailed land, producer, and crop data for both populating their systems and data integrity validations.
17.2	Who is responsible for assuring the other agency properly uses the data?	Other agencies approved internal control/processing methodologies.
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?	Yes.
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?	Administrative controls and procedures are established to maintain consistent system use.

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.)?	County, State, and National USDA office employees can access the data; however, only the county employees are able to modify the data. Also, a limited number of specific NASS employees can view the data.
21	How will user access to the data be determined?	Access must be requested through FSA- 1 3A security forms with justification and approval.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes
		No
22	How will user access to the data be restricted?	Security Identification and Authentication is enforced on all platforms (MF: ACF2, Web: eAuth, AS/400 S36: OS/400 and SSP, UNIX: Sun Solaris and Hyperion). In addition, all platforms offer further Authorization mechanisms (MF: DB2, Web: EAS and SQL, AS/400 S36: DB2 and S36 Partitions and locations, UNIX: Informix).

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No.	Question	Response
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.)?	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 By contacting John W. Underwood, Privacy Officer, at FSA Privacy Act Officer / FSA PII Officer USDA - Farm Service Agency Beacon Facility - Mail Stop 8388 9240 Troost Avenue Kansas City, Missouri 6413 1-3055 Phone: 816-926-6992 Cell: 816-564-8950 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.
		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.

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No.	Question	Response
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 centralized and standardized method of developing program decisions.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<p style="text-align: center;">Yes</p> <p>No – If NO, go to question 30.</p>
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.)?	Data can be retrieved by producer/customer name, tax ID, and/or farm serial 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 www.access.GPO.gov .)	USDA/FSA-2 - Farm Records File (Automated).
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes No

5 Technology

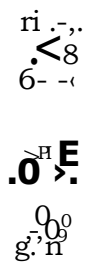
No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<p>Yes</p> <p>No – If NO, the questionnaire is complete.</p>
31.1	How does the use of this technology affect customer privacy?	N/A.

6 Completion Instructions

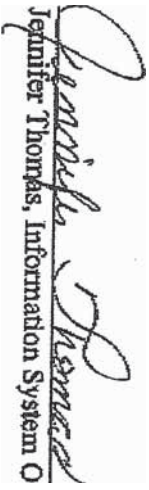
Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-1 1, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.



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 Jennifer Thomas, Information System O

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 John Underwood, Chief Privacy Officer

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 James Gwin, FSA CIO

7/8/2010