Privacy Impact Assessment (PIA)

Noninsured Crop Disaster Assistance Program
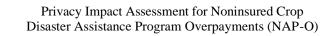### Overpayments (NAP-O)

Revision: *1.01*

Farm Service Agency

Date: *May 27, 2010*

Document Information

Business Owner Details	
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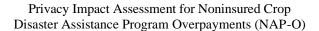| Document Revision and History			
Revision	Date	Author	Comments
1.01	May 17, 2010	Anita Trader, ISO DR	*Initial version*
	May 27, 2010	S. Timbrook, ECS	Initial review updated from baseline, release to system owner for final review.

Table of Contents

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 **Noninsured Crop Disaster Assistance Program Overpayments** 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 ofFederal Information Systems.*

2 System Information

System Information

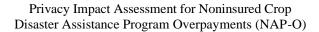|	
Agency:	Farm Service Agency
System Name:	NAP- Overpayments
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	This software provides approved payments for uninsured crops in the event of losses. The payment is based on the established yield, established market price and payment factors. Records are passed to the Accounting Interface System after updating the NAP Producer Payment History File. Overpayments are calculated similarly to the process used for NAP Payment processing. The software determines overpayment amounts and writes the amounts to the overpayment file.
Who owns this system? (Name, agency, contact information)	Sharon Marshall PARMO 6501 Beacon Drive U.S. Department of Agriculture Farm Service Agency Kansas City, MO 64133 (816) 926-2133 Sharon.Marshall@kcc.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)	

3 Data Information

3.1 Data Collection

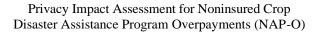| No.	Question	Response
1	Generally describe the data to be used in the system.	Producer data is used in association with crop/livestock production/loss information to determine payments by disaster system. Specifically, a producer's ID, ID type, entity type, name, and address, as well as any associated producer's information are used as identifying information.
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.	Name and address and crop/livestock files are the main sources of information, as well as information gathered from the producers themselves. Farm records and subsidiary files are used in making payments to the customers.
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 producers information is used as key data 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, commodity, and/or livestock information, as well as associated production and/or loss information. Customer provided crop data includes crop, crop type, irrigation practice, intended use, planting period, production data, 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?	Producer/Customer
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 provide financial assistance to producers of non-insurable crops when low yields, loss of inventory or prevented planting occurs due to natural disasters.
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

No.	Question	Response
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)?	Ye s
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	Ye s No
9.3	How will the new data be verified for relevance and accuracy?	Only employees input data, and the data is validated per system requirements and other documents such as system handbooks. Spot checks are also routinely performed to ensure reported production and loss information is accurate
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 provide coverage and make payments.
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?	Unauthorized access is prevented via mainframe controls. For web-based systems, roles are assigned and information retrieval is limited based on those roles
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

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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?	Validation checks and access controls are done during processing to ensure that the integrity of the data is not corrupted. Data backups are created frequently to ensure data integrity in the event of loss or failure of the system. In addition, OIG performs random audits to ensure data and system integrity.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Yes N

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?	N/A
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

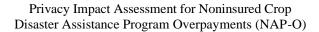| No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	County, State, and National Office FSA users, as well as developers, testing, and help desk employees have access to the data in the system
21	How will user access to the data be determined?	Access must be requested through FSA- 1 3A security forms with justification.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes No
22	How will user access to the data be restricted?	Users are restricted through role-based security within the application. Once access has been properly granted, there are no restrictions to viewing the data. Update capabilities are restricted by User ID.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes
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.)?	Production Adjustment and Risk Management Office and USDA Privacy Office.
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

No.	Question	Response
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?	These systems contain no identifying information such as race, religion, gender, national origin, and age. However, by statute, these systems can determine whether or not a producer is eligible for benefits (payments) based on program parameters
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

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.)?	Data can be retrieved by producer/customer name and tax ID
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

5 Technology

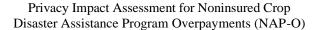| No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	Yes No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	N/A

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 8cis:

1.Yes.

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