



# **Privacy Impact Assessment (PIA)**

**Financial Management Systems (FMS)  
IRS Reporting System (IRS-PPRS)**

**Producer Payment Reporting System (PPRS)**

**Revision: *Final***



**Farm Service Agency**

**Date: June 15, 2010**





## Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	June 15, 2010	R. Barbee, ECS	Initial version for 2010 copied from 2009 FMS PIA
	June 23, 2010	C. Niffen	Made changes per John Underwood on questions 6, 7, 7.1, 30.3
Final	07/12/2010	S. Timbrook, ECS	Marked final, added signatures page, uploaded to CSAM.



Privacy Impact Assessment for  
Financial Management Systems (FMS)  
Producer Payment Reporting System



## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the  
**Financial Management Systems Producer Payment Reporting System**

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.

*Eric Will*  
Eric Will, Information System Owner  
Date 6-22-10

*John W. Underwood*  
John Underwood, Chief Privacy Officer  
Date 6/22/10

*James Gwynn*  
James Gwynn, FSA CIO  
Date 7/8/2010

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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 **Producer Payment Reporting System** 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*.

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## 2 System Information

### System Information

System Information	
Agency:	Farm Service Agency.
System Name:	Producer Payment Reporting System.
System Type:	Major Application General Support System Non-major Application
System Categorization (per FIPS 199):	High Moderate Low
Description of System:	The Producer Payment Reporting System records IRS reportable payments made to producers and provides a wide range of reports to various organizations within and outside FSA.
Who owns this system? (Name, agency, contact information)	Charles "Michael" Boyles FSA/ITSD/ADC/PSCAO Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133 (816) 926-1905 <a href="mailto:Mike.Boyles@kcc.usda.gov">Mike.Boyles@kcc.usda.gov</a>
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. 6051-S Washington, D.C. 20250 (202) 720-2419 <a href="mailto:Brian.Davies@wdc.usda.gov">Brian.Davies@wdc.usda.gov</a>



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Who completed this document? (Name, agency, contact information)	Eric Will ITSD/ADC/PSCAO/CSSG Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133 (816)926-2664 <a href="mailto:Eric.Will@kcc.usda.gov">Eric.Will@kcc.usda.gov</a>
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### 3 Data Information

#### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>Sensitive data is required to comply with IRS mandates for reporting of taxable benefits for the producer and FSA.</p> <p>Customer: Name, Address, TIN/SSN, banking information, delinquent debt and debtor information, information about the payment(s) made to the farmer/producer, SCIMS Core ID, program code and Treasure Referral Status based on TIN.</p> <p>Employee: eAuth user ID.            Other: Detail program data is maintained at the State and County Office</p> <p>State Code, County Code, Tax ID, Tax ID Type (E, 1, S) payee name and address, amount paid, program identification, transaction date, Group Entry Stamp.</p> <p>PPRS Customer - Payment Management Office, Payment Reporting &amp; Finance Group, producers and IRS.</p>
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<p>Yes</p> <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.	<p>Yes</p> <p>No</p>

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No.	Question	Response
4	Sources of the data in the system.	<p>Manual input from County via System 36 and transmitted to the Kansas City Comm Center. NPS data is merged with county office transmissions and are input to FMS.</p> <p>Federal Agency Sources: AMS, FNS, Kansas City Commodity Office, FSA, Department of Justice, US Treasury, Minneapolis Federal Reserve Bank.</p> <p>Information comes from producers when they sign up for access (placed in SCIMS). As producers receive IRS reportable farm program payments, activity is processed through the AE7 application. Data for PPRS is split off and provided as a detail transaction. Detail payment data is processed weekly and applicable data bases are updated with the current activity. Data is verified for accuracy and referential integrity is utilized. Verification of the data and error resolution is provided by the Payment Reporting &amp; Finance group.</p>
4.1	What data is being collected from the customer?	Name, Address, SSN, TIN, State Code, County Code, payee Tax ID type code, program code, transaction type, time stamp, transaction amount, transaction date, program year, information from SCIMS, name and address, income.
4.2	What USDA agencies are providing data for use in the system?	Farm Service Agency State and County Offices.
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?	Cotton Cooperatives, Peanut Marketing Association, banking institutions, CADE Data File, Farmers, Producers, vendors.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<p>Yes</p> <p>No – If NO, go to question 6.</p>

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No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	The PPRS system provides numerous customer data control reports depicting all totals and balances within the various calendar year data bases. The Payment Reporting & Finance Group verifies accuracy of the processing by using the PPRS reports and control reports supplied by feeder systems. Error records are researched and out of balance conditions are analyzed and resolved prior to the next processing. If out of balance conditions are encountered during the weekly update procedure the system will ABEND providing an error message.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	The PPRS system provides numerous USDA source control reports depicting all totals and balances within the various calendar year data bases. The Payment Reporting & Finance Group verifies accuracy of the processing by using the PPRS reports and control reports supplied by feeder systems. Error records are researched and out of balance conditions are analyzed and resolved prior to the next processing. If out of balance conditions are encountered during the weekly update procedure the system will ABEND providing an error message.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	The PPRS system provides numerous non-USDA source control reports depicting all totals and balances within the various calendar year data bases. The Payment Reporting & Finance Group verifies accuracy of the processing by using the PPRS reports and control reports supplied by feeder systems. Error records are researched and out of balance conditions are analyzed and resolved prior to the next processing. If out of balance conditions are encountered during the weekly update procedure the system will ABEND providing an error message.

### 3.2 Data Use

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<b>Question</b>	<b>Response</b>
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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 record IRS reportable payments made to producers and provide a wide range of reports to various organizations within and outside FSA
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 s 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?	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?	PPRS is required to comply with IRS mandates for reporting of taxable benefits for the producer and FSA.
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.

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No.	Question	Response
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?	3 years.
14.2	What are the procedures for purging the data at the end of the retention period?	Refer to USDA standard media disposal policy and procedure found in FSA 6-IRM and USDA DR 3601-001. IRS Reporting System: NITC File Maintenance Procedures for Scratch files.
14.3	Where are these procedures documented?	Refer to USDA standard media disposal policy and procedure found in FSA 6-IRM and USDA DR 3601-001. IRS Reporting System: NITC File Maintenance Procedures for Scratch files.



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No.	Question	Response
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?	Data, after completion, is not altered. The information is protected by agency policies and the security controls issued by USDA. The key is to ensure the accuracy of this data prior to entering it into the system. The key method utilized is the Acceptance Testing process. IRS Reporting System: Internal NITC controls.
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

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?	IRS Reporting System: Reporting information to the IRS.
17.2	Who is responsible for assuring the other agency properly uses the data?	IRS and FSA/FMD.
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?	Consult 6-IRM for details of the configuration management process for this system.

### 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, System Administrators, Developers, and IT Personnel.

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No.	Question	Response
21	How will user access to the data be determined?	Access is determined by discretion of management. Users must have valid management approved reason to access data.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	Yes s No
22	How will user access to the data be restricted?	Access to PPRS is granted through the security office and DBMO. Managers submit employees for access. Only Payment Management staff is granted UPDATE access to PPRS support tables. These tables include Category Code, Transaction Code, Program Name, Commodity Code and Program Code tables. Pursuant to referential integrity constraints, a strict sequence of input must be followed when inputting new program code information, etc. SELECT (read only) access is granted for detail tables according to the employee needs.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	Yes s
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	Yes s 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.

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No.	Question	Response
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 64131-3055 Phone: 816-926-6992 Cell: 816-564-8950 Fax: 816-448-5833 <a href="mailto:John.Underwood@kcc.usda.gov">mailto:John.Underwood@kcc.usda.gov</a>
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?	The Financial Management Systems are implemented using a methodology that ensures data processing will be accomplished in the same manner for all customers.
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.

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## 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 personal ID. The personal ID is used as a key to retrieve pertinent data from the system. Employee access is strictly monitored.
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) USDA/FSA-14 - Applicant/Borrower
30.3	If the system is being modified, will the SOR require amendment or revision?	Yes

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## 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.

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## 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.