



**Privacy Impact Assessment  
(PIA)  
Price Support Systems (PSS)  
State Online Reporting System  
(SORS)**

**Revision: *Final***



**Farm Service Agency**

**Date: *May 28, 2010***





## Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	May 28, 2010	Anita Trader, ISO DR	Populated from previous documents.
1.02	June 1, 2010	Judy Sobbing, ECS	Reviewed and updated.
	June 28, 2010	C. Niffen	Made changes per John Underwood on questions 3, 28, 30.2
Final	June 29, 2010	S. Timbrook, ECS	Marked Final, added signatures

Privacy Impact Assessment for  
State Online Reporting System (SORS)



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**Privacy Impact Assessment Authorization  
Memorandum**

I have carefully assessed the Privacy Impact Assessment for the  
State Online 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.

  
\_\_\_\_\_  
Tonya Gross, System Owner  
Date 6-22-10

  
\_\_\_\_\_  
John Underwood, Chief Privacy Officer  
Date 6/25/10

  
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James Owyun, FSA CIO  
Date 6/29/2010



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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 **State Online 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*.



## 2 System Information

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orting System (SORS)
at ort Syst pplica
Id State Online Reporting System (SORS) provi ry, detail, and historical information on PSS applicatio ovided from PSS legacy and web applications d hoc reporting). The purpose of SORS is to improve the ice Support loan summary data to all levels of F ustry, and the general put
e Ave. SW 4-S ., 20  <a href="http://c.usda">c.usda</a>
m Security Program Manager (IS SP of Agricult e ce Avenue . 20  <a href="http://c.usda">c.usda</a>
F of Agricult er j 64  <a href="http://kcc.usda">kcc.usda</a>

### System Information



## 3 Data Information

### 3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	The data in the system is transactional and financial data, i.e., quantity and amount for alternate loan payments such as facility loans, commodity loans, and loans for crops not sold.
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.	Various alternate loan applications such as FLS and APSS along with relevant databases such as for eLDP.
4.1	What data is being collected from the customer?	None as this is a reporting application that reflects data previously collected.
4.2	What USDA agencies are providing data for use in the system?	Farm Service Agency (FSA).
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?	N/A.



No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Summary reporting comparisons to legacy reporting system.
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?	For the disbursement of qualified alternate loan program payments. The data collected is used by SORS to provide management reports on FSA programs.
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?	Financial reporting.
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?	Comparison of Summary reports with legacy reports.

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No.	Question	Response
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 facilitate the disbursement of Price Support Systems alternate payments and provide management/financial reports on FSA programs.
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?	All users must be identified and authenticated by eAuth prior to accessing the reporting system.
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?	Data is retained for 5 years.
14.2	What are the procedures for purging the data at the end of the retention period?	5 year ‘close-out’ procedure is executed on an annual basis.
14.3	Where are these procedures documented?	Requirements are issued by the program sponsor.



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?	Comparison of Summary reports with legacy reports.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	Yes 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?	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?	All users access the same system which is based on a single, centralized database.

### 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.)?	FSA employees and contractors can view standardized reports or request ad-hoc reports using a standardized SQL query report process. Public users only have access to predefined standardized reports.

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No.	Question	Response
21	How will user access to the data be determined?	Following standard agency procedures, job function and role are key factors in the 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?	Access to the data is restricted through role-based authorization to ad-hoc reporting functions while public access is granted to predefined standardized reports made available to all users.
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 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



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No.	Question	Response
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 centralized and standardized method of making program decisions
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.)?	Upon authentication to the system, the user may retrieve summarized customer data via report name from the public site. Upon authentication to the system, FSA employees and contractors may query the database for reporting purposes by database objects such as loan type.
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> .)	The payment and loan information is operated under USDA/FSA-2 - Farm Records File (Automated) and USDA/FSA-14 - Applicant/Borrower
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.