



**Privacy Impact Assessment
(PIA)
Price Support Systems
(PSS)
Electronic Loan Deficiency Payments
(eLDP)**

Revision: *Final*



Farm Service Agency

Date: *May 12, 2010*



Privacy Impact Assessment for
Electronic Loan Deficiency Payments (eLDP)



Document Information

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|------------------------|--|
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| Document Revision and History | | | |
|-------------------------------|---------------|----------------------|---|
| Revision | Date | Author | Comments |
| 1.01 | May 12, 2010 | Anita Trader, ISO DR | Initial version for 2010 populated from prior documents |
| 1.02 | June 1, 2010 | Judy Sobbing, ECS | Reviewed and updated |
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**Privacy Impact Assessment Authorization
Memorandum**

I have carefully assessed the Privacy Impact Assessment for the

Electronic Loan Deficiency Payments

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.


Tonye Cross, System Owner
Date 6-17-10


John Underwood, Chief Privacy Officer
Date 6/15/10


James Griffin, FSA CIO
Date 6/24/10



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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 **Electronic Loan Deficiency Payments** 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: | Electronic Loan Deficiency Payments. |
| System Type: | Major Application General Support System Non-major Application |
| System Categorization (per FIPS 199): | High Moderate Low |
| Description of System: | PSS Electronic Loan Deficiency Payments (eLDP) allows eligible producers to request loan deficiency payments 24 hours a day, seven days per week. The eLDP permits producers to obtain decisions on payments including direct deposit of approved requests within 48 hours in most instances. LDP benefits remain available at local FSA Service Centers. However, eLDP services provide greater flexibility to producers who conduct business online and want to avoid travel time and expense to and from the local FSA office. The applicable LDP rate is based upon the rate in effect on the application date for the location of the stored commodity or the rate in effect for delivered quantities. Eligible loan commodities include: Barley, Canola, Chickpeas (small and large starting with 2009 crop), Corn, Crambe, Dry Peas, Flaxseed, Grain Sorghum, Honey, Hay (LDP only), Lentils, Mohair, Mustard Seed, Oats, Peanuts, Rapeseed, Rice (long and medium), Safflower, Silage (LDP only), Soybeans, Sunflower Oil, Sunflower Seed, Wheat, Upland Cotton, Wool, and Unshorn pelts (LDP only). |
| Who owns this system? (Name, agency, contact information) | Fred Gustafson ITSD/ADC/PSCAO 6501 Beacon Drive Kansas City, MO 64133 (816) 926-2137 Fred.Gustafson@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 (IS SPM) 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) | David Goodman 6501 Beacon Drive Kansas City, MO 64133 (816) 926-2136 David.Goodman@kcc.usda.gov |

3 Data Information

3.1 Data Collection

| No. | Question | Response |
|-----|---|--|
| 1 | Generally describe the data to be used in the system. | eLDP uses Social Security/Tax ID Number, name, address, entity type, commodity receipt data, acreage/production data, and AGI/Permitted Entity and Eligibility data. |
| 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 s No |



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| No. | Question | Response |
|-----|--|---|
| 4 | Sources of the data in the system. | SCIMS (name & address), COPS (cotton receipt data), Compliance (acreage data), AGI & Eligibility web services. |
| 4.1 | What data is being collected from the customer? | Acreage/Production information Eligibility information Producer information Customer profile – including Social Security/Tax ID Number, name, address. |
| 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? | Data collected from customers is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness manually by State and County personnel 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 from USDA sources are checked for accuracy and completeness upon entry into the source system. In addition, certification checks are performed. |
| 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

| Question | Response |
|----------|----------|
|----------|----------|



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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? | The FSA Cooperative Marketing Association System (CMA) is a National Computer System that is designed, maintained and operated to allow marketing cooperatives the ability to provide Cooperative Marketing Associations (CMAs) and Loan Servicing Agents (LSAs) timely and accurate eligibility, farm record and payment limitation data in order to determine producer eligibility for obtaining marketing assistance loans, loans and loan deficiency payments (LDP) through CMA's, LSAs and DMAs. |
| 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 |



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| No. | Question | Response |
|------|---|---|
| 9.3 | How will the new data be verified for relevance and accuracy? | <p>Data collected from customers is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness manually by State and County personnel upon initial entry into the system and then again when any required updates are made.</p> <p>In addition, spot check, audits, manual verification, system tested calculations and system edits are used.</p> |
| 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? | Used to report/track payments by entity/producer. |
| 11 | Will the data be used for any other uses (routine or otherwise)? | <p>Yes</p> <p>No – If NO, go to question 12.</p> |
| 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? | <p>Yes</p> <p>No – If NO, go to question 13.</p> |
| 12.1 | What controls are in place to protect the data and prevent unauthorized access? | Identification and authentication via USDA eAuthentication Security Software and further access restriction via FSA Extensible Authorization System and including location limits. |
| 13 | Are processes being consolidated? | <p>Yes</p> <p>No – If NO, go to question 14.</p> |
| 13.1 | What controls are in place to protect the data and prevent unauthorized access? | Changing passwords, new passwords, password verification, call back features of routers to associations, firewalls, system monitoring. |



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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? | Fairness in making determinations is assured because policy requires that the information be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again 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

| 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. |



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| No. | Question | Response |
|------|--|----------|
| 19.1 | How will consistent use of the system and data be maintained in all sites? | N/A. |

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 Service Center staff and management, FSA National and KC staff including support staff and management, and producers making application. |
| 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 s No |
| 22 | How will user access to the data be restricted? | Access is restricted based on role and/or location for FSA employees and contractors using eAuth and EAS. Producer can only access their pending application. |
| 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 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. |
| 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? | 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 customer data using SSN or SCIMS unique I.D. |
| 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. |



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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.