



Privacy Impact Assessment

Imaging

Revision: 1.4

USDA Rural Development

Prepared By: Kathy Anderson

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Document Information

Owner Details	
Name	Kathy Anderson
Contact Number	(314) 457-5012
E-mail Address	kathy.anderson@stl.usda.gov

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Distribution List			
Name	Title	Agency/Office	Contact Information
Kathy Anderson	System Owner	USDA/RD/ O&M/DCIO/ESDDD	kathy.anderson@stl.usda.gov (314) 457-5012
Mike Sutton	System POC	USDA/RD/ O&M/DCIO/ESDDD	michael.sutton@stl.usda.gov (314) 457-5015
Eugene Texter	Information System Security	USDA/RD/O&M/DCIO/ISSS	eugene.texter@stl.usda.gov (314) 457-4778
Bill Dallas	Information System Security	USDA/RD/O&M/DCIO/ISSS	bill.dallas@stl.usda.gov (314) 457-4771
Felicia Williams	Information System Security	USDA/RD/O&M/DCIO/ISSS	felicia.williams@stl.usda.gov (314) 457-4779



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1 System Information

System Information	
Agency:	USDA Rural Development
System Name:	Imaging
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low



Privacy Impact Assessment for Imaging

<p>Description of System:</p>	<p>The Imaging system was instituted because of the Paperwork Reduction Act. In an effort to comply with the ruling it was necessary to institute a set of distributed systems that would not only scan in old documents but also process new documents electronically. The Imaging System consists of two modules which include and Retrieval and Indexing.</p> <p>Imaging is a web-based system created to lessen the public paperwork burden. This is mandated by the Paperwork Reduction Act and more recently, as part of the Administration's regulatory reform efforts, former President Clinton directed Federal agencies to increase their use of electronic means of information collection and, where feasible, to decrease the frequency of reporting by the public by 50%.</p> <p>In an effort to comply with the ruling it was necessary to create a set of distributed systems that would not only scan in old documents but also process new documents electronically. The Imaging System consists of two modules, Indexing and Retrieval.</p> <p>Indexing- Documents are scanned/faxed into the image repository and placed in an "Indexing Queue". Imaging users access the Imaging website and utilize web applications to populate index values for each scanned image. This application then writes the index values to the Imaging database for future retrieval of the images. Personally Identifiable Information (PII) data such as SSN/TIN are in the Imaging System through images of loan documents from loan systems such as Rural Utilities Loan Servicing System (RULSS), Single Family Housing Direct (SFH), Guaranteed Loan System (GLS) and the Deputy Chief Financial Officer (DCFO).</p> <p>Retrieval- Provides a method to retrieve and view scanned and indexed documents from the image repository. The user uses the Web Image Retrieval application to retrieve and view the images. The user searches for documents based on previously entered index values to return the images. Users cannot delete or change images or index values from within this application. Again, no PII data is used as a unique identifier, however PII data can be found on the individual images.</p> <p>Using scanning software and equipment the Imaging application provides storage of electronic images of loan application documents and other paper requests sent to the Rural Development agency. As a result, this system provides an electronic means to view over 79 million images. Access to documents is provided through client server and intranet based applications.</p>
<p>Who owns this system? (Name, agency, contact information)</p>	<p>Kathy Anderson Branch Chief, Enterprise Technology Branch (ITPM) USDA Rural Development 4300 Goodfellow Blvd. Bldg 104 St. Louis, MO 63120 kathy.anderson@stl.usda.gov 314-457-5012</p>



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<p>Who is the security contact for this system? (Name, agency, contact information)</p>	<p>Eugene Texter Information System Security Staff USDA Rural Development Building 105, FC-44 4300 Goodfellow Boulevard St. Louis, MO 63120 eugene.texter@stl.usda.gov 314-457-4778</p> <p>Brenda Dinges Information System Security Program Manager USDA Rural Development Building 105, FC-44 4300 Goodfellow Boulevard St. Louis, MO 63120 brenda.dinges@stl.usda.gov 314-457-4772</p>
<p>Who completed this document? (Name, agency, contact information)</p>	<p>Kathy Anderson Branch Chief, Enterprise Technology Branch (ITPM) USDA Rural Development 4300 Goodfellow Blvd. Bldg 104 St. Louis, MO 63120 kathy.anderson@stl.usda.gov 314-457-5012</p>



2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Imaging provides electronic processing of loan applications and other paper requests coming into the Rural Development (RD) agency. This system provides an electronic means to access past loan documents. This system essentially serves as an electronic file storage center.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3. The system has scanned images of this information.
2.1	State the law or regulation that requires the collection of this information.	Consolidated Farm and Rural Development Act (7 U.S.C. 1921 et seq); and Title V of the Housing Act of 1949 as amended (42 U.S.C. 1471 et seq)
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	
4.1	What data is being collected from the customer?	Privacy Act protected information to include (but not limited to): SSN, Taxpayer Identification (ID) Numbers, debt payment information, addresses. This information is not collected but scanned from loan granting systems.
4.2	What USDA agencies are providing data for use in the system?	Rural Developments - Rural Housing Service and Rural Utility Service offices provide documents to Central Servicing Center (CSC) to be scanned into the Imaging system.
4.3	What state and local agencies are providing data for use in the system?	No state and local agencies provide data for imaging System.
4.4	From what other third party sources is data being collected?	There are no third party sources.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and	None.



No.	Question	Response
	completeness?	
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A

2.2 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?	Imaging provides electronic processing of loan applications and other paper requests coming into the Rural Development (RD) agency. This system provides an electronic means to access past loan documents. This system essentially serves as an electronic file storage center.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The "System" does not make determinations but systems users input answers into the system for tracking.
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	Imaging provides electronic processing of loan applications and other paper requests coming into the Rural Development (RD) agency. This system provides an electronic means to



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No.	Question	Response
	the data being collected?	access past loan documents. This system essentially serves as an electronic file storage center.
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	N/A

2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	The Imaging system contains read-only static imaged documents that do not change.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.4 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.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19. Front-end Imaging components are hosted through USDA RD in St. Louis, MO. Concerning FAX and Scan services and inputs, users at different sites all use consistent Imaging processing controls, guidance, and agency driven policies
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	N/A

2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	The Imaging system will be available to system users, managers, and Imaging Systems Administrators who are granted access to the system based on job function and need-to-know.
21	How will user access to the data be determined?	Access is controlled by userID and password. Access rights are granted to designated individuals only when a written request is approved by their supervisor. The User Access Management Team (UAMT) follows their procedures to provide access to the system. The ISSS personnel approve and process elevated access requests. The procedures are documented.

No.	Question	Response
		<p>Desk Procedures document the process for establishing, activating, and modifying IDs. System Owners define this process. System Owners define Groups and account types. System Point of Contact assigns group membership and determines need-to-know validation. The POC is responsible for verifying user identification; the UAMT relies on a POC supplying the correct userid and password to Logbook to identify themselves. Logbook tickets are the tool used to track authorized requests by approving Point of Contact (POC).</p> <p>Currently RD reviews reports from HR on a bi-weekly basis. The organization employs automated mechanisms to support the management of information system accounts. Temporary and emergency accounts are not used or authorized. ISSS UAM Team does not manage Guest and Anonymous accounts. POCs (empowered by RD IT managers) are responsible for notifying UAMT if access or roles need to be modified and periodically reviewing and certifying established access.</p>
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	See response to #21.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

2.6 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.)?	The System Owner
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	<p>Customers and employees may contact the Freedom of Information Officer:</p> <p style="text-align: center;">Andrea Jenkins Freedom of Information Officer Rural Development, USDA</p>



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No.	Question	Response
		7th Floor, Reporter's Bldg. Washington, DC 20250 Andrea.Jenkins@wdc.usda.gov (202) 692-0029
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?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> 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: <ul style="list-style-type: none"> ▪ 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<u>DM 3515-002, section e states:</u> To fulfill the commitment of the USDA to protect customer and employee data, several issues must be addressed with respect to privacy: <ol style="list-style-type: none"> 1. The use of information must be controlled; and 2. Information may be used only for a necessary and lawful purpose. 3. It is used as a repository for read only scanned documents. Where Public Affairs systems of records are involved: <ol style="list-style-type: none"> 1. Individuals must be informed in writing of the principal purpose and routine uses of the information being collected from them; 2. Information collected for a particular purpose should not be used for another purpose without the subject's consent unless such other uses are specifically authorized or mandated by law; and 3. Any information used must be sufficiently accurate, relevant, timely, and complete to assure fair treatment of the individual. Also, P.L. 95-454, the Civil Service Reform Act



No.	Question	Response
		of 1978 which is enforced by The U.S. Equal Employment Opportunity Commission (EEOC) ensures the equitable treatment of the employees.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	N/A

3 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.)?	Yes. Some data can be retrieved by a previously entered indexed value. In some program areas, the borrowers ID is used to identify the borrower.
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 .)	DOCID:agri_003-27; SOR Notice USDA/RURAL DEVELOPMENT – 1; No date available
30.3	If the system is being modified, will the SOR require amendment or revision?	<input checked="" type="checkbox"/> Yes – as needed. <input type="checkbox"/> No

4 Technology

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



5 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, 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.

Privacy Impact Assessment Authorization


Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Imaging
(System Name)

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.


Kathy Anderson - System Owner

4/17/09
Date


Brenda Dinges - Senior Official for Privacy

4/22/09
Date


John Distler - Agency DCIO

4/28/09
Date