



# **U.S. DEPARTMENT OF AGRICULTURE**

## **PRIVACY IMPACT ASSESSMENT**

VERSION 1.4

**OFFICE OF THE CHIEF PRIVACY OFFICER**



## Privacy Impact Assessment

The completion of USDA Privacy Impact Assessments (PIAs) is mandated for any rulemaking, program, system, or practice that collects or uses PII under the authority of the E-government Act of 2002 (44 U.S.C. § 208(b)) and USDA DR 3515-002, Privacy Policy and Compliance for Personally Identifiable Information (PII).

*The PIA is designed to identify risk associated with the use of PII by a system, program, project or practice, and to ensure that vital data stewardship issues are addressed for all phases of the System Development Life Cycle (SDLC) of IT systems. It also ensures that security and privacy protections are built into an IT system during its development cycle. By regularly assessing privacy concerns during the development process, USDA ensures that proponents of a program or technology have taken its potential privacy impact into account from the beginning. The PIA also serves to help identify what level of security risk is associated with a program or technology. In turn, this allows the Department to properly manage the security requirements under the Federal Information Security Management Act (FISMA).*

USDA DR 3515-002, Privacy Policy and Compliance for Personally Identifiable Information (PII).

Please note that the E-government Act of 2002 requires that a PIA be made available to the public. In order to comply with this requirement, PIAs will be published online for the general public to view. When completing this document please use simple, straight-forward language, avoid overly technical terminology, and write out acronyms the first time you use them to ensure that the document can be read and understood by the general public.

**Guidance on how to complete the following PIA Questionnaire is found in the USDA PIA Guide.**



# Privacy Impact Assessment

**Privacy Impact Assessment for the USDA IT System/Project:**  
Store Tracking and Redemption System (Legacy STARS/STARS 3.0)

## *Food, Nutrition, and Consumer Services*

Date PIA submitted for review:  
5/29/24

Mission Area System/Program Contacts:

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## Abstract

The Store Tracking and Redemption System (STARS) allows for the authorization and oversight of more than 260,000 retailers and specialized meal services to accept EBT cards or SNAP benefits.

## Overview

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) serves our nation's most vulnerable citizens through access to food and nutritional resources that support a healthy diet and increase economic self-sufficiency for low-income households. This critical service is delivered using the Supplemental Nutrition Assistance Program (SNAP) and is enabled by the Store Tracking and Redemption System (STARS) and related subsystems, which allow for the authorization and oversight of more than 250,000 retailers and specialized meal services to accept food stamps or SNAP benefits. To improve services and provide a more cost-effective solution, FNCS is undertaking the modernization of STARS to a Software as a Service (SaaS) solution. This solution (STARS 3.0) runs in parallel to, and will eventually be integrated with, (legacy) STARS.

## Section 1.0 Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what SORN applies, if an ATO has been completed and if there is Paperwork Reduction Act coverage.

### 1.1. What legal authorities and/or agreements permit the collection of information by the project or system?

7 U.S.C. 2018); section 405(c)(2)(C) of the Social Security Act (42 U.S.C. 405(c)(2)(C)); and section 6109(f) of the Internal Revenue Code of 1986 (26 U.S.C. 6109(f)).

### 1.2 Has Authorization and Accreditation (A&A) been completed for the system?

Yes, 12/5/23-12/5/26.

### 1.3. What System of Records Notice(s) (SORN(s)) apply to the information?

Privacy Act System of Records (SORN 9) – Food Stamp Program Retailer Information published December 27, 2010.

### 1.4. Is the collection of information covered by the Paperwork Reduction Act?

Yes.

## Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.



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### 2.1. What information is collected, used, disseminated, or maintained in the system/program?

STARS / STARS 3.0 collect the name, address, applicant's social security number, birth date and store owners Employer ID Numbers. In addition, the system collects the name and email address of the system users. Financial Information such as the Sales Data – annual sales information from retailers per food category -- is collected from new applicants and those requesting re-authorization to ensure compliance with regulations. Once authorized, sales data are not requested every year.

PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional sensitive PII is collected, used, disseminated, created, or maintained, please list those in the text box below.

| Identifying Numbers                 |                                               |                                     |                                                                 |                                                                                      |
|-------------------------------------|-----------------------------------------------|-------------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | Social Security number                        | <input checked="" type="checkbox"/> | Truncated or Partial Social Security number                     |                                                                                      |
| <input checked="" type="checkbox"/> | Driver's License Number                       | <input type="checkbox"/>            | License Plate Number                                            |                                                                                      |
| <input type="checkbox"/>            | Registration Number                           | <input type="checkbox"/>            | File/Case ID Number                                             |                                                                                      |
| <input type="checkbox"/>            | Student ID Number                             | <input type="checkbox"/>            | Federal Student Aid Number                                      |                                                                                      |
| <input type="checkbox"/>            | Passport number                               | <input type="checkbox"/>            | Alien Registration Number                                       |                                                                                      |
| <input type="checkbox"/>            | DOD ID Number                                 | <input type="checkbox"/>            | DOD Benefits Number                                             |                                                                                      |
| <input checked="" type="checkbox"/> | Employee Identification Number                | <input type="checkbox"/>            | Professional License Number                                     |                                                                                      |
| <input checked="" type="checkbox"/> | Taxpayer Identification Number                | <input type="checkbox"/>            | Business Taxpayer Identification Number (sole proprietor)       |                                                                                      |
| <input type="checkbox"/>            | Credit/Debit Card Number                      | <input type="checkbox"/>            | Business Credit Card Number (sole proprietor)                   |                                                                                      |
| <input type="checkbox"/>            | Vehicle Identification Number                 | <input type="checkbox"/>            | Business Vehicle Identification Number (sole proprietor)        |                                                                                      |
| <input checked="" type="checkbox"/> | Personal Bank Account Number                  | <input type="checkbox"/>            | Business Bank Account Number (sole proprietor)                  |                                                                                      |
| <input type="checkbox"/>            | Personal Device Identifiers or Serial Numbers | <input type="checkbox"/>            | Business device identifiers or serial numbers (sole proprietor) |                                                                                      |
| <input type="checkbox"/>            | Personal Mobile Number                        | <input type="checkbox"/>            | Business Mobile Number (sole proprietor)                        |                                                                                      |
| <input type="checkbox"/>            | Health Plan Beneficiary Number                |                                     |                                                                 |                                                                                      |
| Biographical Information            |                                               |                                     |                                                                 |                                                                                      |
| <input checked="" type="checkbox"/> | Name (including nicknames)                    | <input type="checkbox"/>            | Gender                                                          | <input type="checkbox"/> Business Mailing Address (sole proprietor)                  |
| <input checked="" type="checkbox"/> | Date of Birth (MM/DD/YY)                      | <input type="checkbox"/>            | Ethnicity                                                       | <input type="checkbox"/> Business Phone or Fax Number (sole proprietor)              |
| <input type="checkbox"/>            | Country of Birth                              | <input type="checkbox"/>            | City or County of Birth                                         | <input type="checkbox"/> Group/Organization Membership                               |
| <input type="checkbox"/>            | Citizenship                                   | <input type="checkbox"/>            | Immigration Status                                              | <input type="checkbox"/> Religion/Religious Preference                               |
| <input checked="" type="checkbox"/> | Home Address                                  | <input checked="" type="checkbox"/> | Zip Code                                                        | <input type="checkbox"/> Home Phone or Fax Number                                    |
| <input type="checkbox"/>            | Spouse Information                            | <input type="checkbox"/>            |                                                                 | <input type="checkbox"/> Children Information                                        |
| <input type="checkbox"/>            | Marital Status                                | <input type="checkbox"/>            | Military Service Information                                    | <input type="checkbox"/> Mother's Maiden Name                                        |
| <input type="checkbox"/>            | Race                                          | <input type="checkbox"/>            | Nationality                                                     | <input type="checkbox"/> Global Positioning System (GPS)/Location Data               |
| <input checked="" type="checkbox"/> | Personal e-mail address                       | <input type="checkbox"/>            | Business e-mail address                                         | <input type="checkbox"/> Personal Financial Information (including loan information) |



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|                                                           |                                                                                   |                                     |                                                            |                          |                                                             |
|-----------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------|------------------------------------------------------------|--------------------------|-------------------------------------------------------------|
| <input type="checkbox"/>                                  | Employment Information                                                            | <input checked="" type="checkbox"/> | Alias (username/screenname)                                | <input type="checkbox"/> | Business Financial Information (including loan information) |
| <input type="checkbox"/>                                  | Education Information                                                             | <input type="checkbox"/>            | Resume or curriculum vitae                                 | <input type="checkbox"/> | Professional/personal references                            |
| <b>Biometrics/Distinguishing Features/Characteristics</b> |                                                                                   |                                     |                                                            |                          |                                                             |
| <input type="checkbox"/>                                  | Fingerprints                                                                      | <input type="checkbox"/>            | Palm prints                                                | <input type="checkbox"/> | Vascular scans                                              |
| <input type="checkbox"/>                                  | Retina/Iris Scans                                                                 | <input type="checkbox"/>            | Dental Profile                                             | <input type="checkbox"/> | Scars, marks, tattoos                                       |
| <input type="checkbox"/>                                  | Hair Color                                                                        | <input type="checkbox"/>            | Eye Color                                                  | <input type="checkbox"/> | Height                                                      |
| <input type="checkbox"/>                                  | Video recording                                                                   | <input type="checkbox"/>            | Photos                                                     | <input type="checkbox"/> | Voice/ Audio Recording                                      |
| <input type="checkbox"/>                                  | DNA Sample or Profile                                                             | <input type="checkbox"/>            | Signatures                                                 | <input type="checkbox"/> | Weight                                                      |
| <b>Medical/Emergency Information</b>                      |                                                                                   |                                     |                                                            |                          |                                                             |
| <input type="checkbox"/>                                  | Medical/Health Information                                                        | <input type="checkbox"/>            | Mental Health Information                                  | <input type="checkbox"/> | Disability Information                                      |
| <input type="checkbox"/>                                  | Workers' Compensation Information                                                 | <input type="checkbox"/>            | Patient ID Number                                          | <input type="checkbox"/> | Emergency Contact Information                               |
| <b>Device Information</b>                                 |                                                                                   |                                     |                                                            |                          |                                                             |
| <input type="checkbox"/>                                  | Device settings or preferences (e.g., security level, sharing options, ringtones) | <input type="checkbox"/>            | Cell tower records (e.g., logs, user location, time, etc.) | <input type="checkbox"/> | Network communications data                                 |
| <b>Specific Information/File Types</b>                    |                                                                                   |                                     |                                                            |                          |                                                             |
| <input type="checkbox"/>                                  | Personnel Files                                                                   | <input type="checkbox"/>            | Law Enforcement Information                                | <input type="checkbox"/> | Credit History Information                                  |
| <input type="checkbox"/>                                  | Health Information                                                                | <input type="checkbox"/>            | Academic/Professional Background Information               | <input type="checkbox"/> | Civil/Criminal History Information/Police Record            |
| <input type="checkbox"/>                                  | Case files                                                                        | <input type="checkbox"/>            | Security Clearance/Background Check                        | <input type="checkbox"/> | Taxpayer Information/Tax Return Information                 |

PII also collected: Agency assigned number, case number, accounts, and permits.

## 2.2. What are the sources of information in the system/program?

Store owners wanting to participate in the program offer their own information. Also, Electronic Benefit Transfer (EBT) processors provide redemption information for each store in the program.

### 2.2.1. How is the information collected?

Store owners, when filling out applications to participate in the program, offer their information through a website or in a paper form. On a weekly basis, Electronic Benefit Transfer (EBT) processors provide redemption information for each store in the program.

## 2.3. Does the project/program or system use information from commercial sources or publicly available data. If so, explain why this is used?

No.

## 2.4. How will the information be checked for accuracy? How often will it be checked?



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Store information is collected and reviewed. As part of the application process, the application data in some cases is verified with a visit to the store. Store owners (program applicants) are the source for the more sensitive privacy data.

System user information is taken directly from the USDA e-Authentication system and is assumed accurate.

### **2.5. Does the system/program use third-party websites?**

No

#### **2.5.1. What is the purpose of the use of third-party websites?**

Not applicable.

##### **2.5.1.1. What PII will be made available to the agency through the use of third-party websites?**

Not applicable.

### **2.6. PRIVACY IMPACT ANALYSIS: Related to Characterization of Information.**

Not applicable.

## **Section 3.0 Uses of the Information**

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.

### **3.1. Describe why and how the information collected, used, disseminated and/or maintained will support the program's business purpose?**

The store owner's information is used to determine if the owner has a negative history with the SNAP program and can be used as a denial reason for future applications. For the store redemption information from the EBT processors, that information is used to determine if a store is still active within the SNAP program.

For system user information, their name and e-Authentication ID are used to track their actions within the system and their email address is used to send technical tips, release notes, notifications of system outages and planned maintenance to them. In some cases, the username is utilized on letters sent on the user's behalf to store owners.

Store owners, when filling out applications to participate in the program, offer their information through a website or on a paper form. On a weekly basis, Electronic Benefit Transfer (EBT) processors provide redemption information for each store in the program.



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**3.2. Does the system/project/program use technology to conduct electronic searches, queries, or analysis in an electronic database to discover or locate a predictive pattern or anomaly? If so, state how USDA plans to use such results.**

STARS: No.

STARS 3.0: Salesforce utilizes a global search out of the box functionality to search within the records stored within its associated records. The results will be used by internal FNS users only to find records stored within STARS 3.0 application.

### **3.3. PRIVACY IMPACT ANALYSIS: Related to uses of the information.**

**Privacy Risk:** Unprotected PII may be exposed.

**Mitigation:** All PII data is encrypted at rest and in transit. Access to the data is tightly controlled through the use of e-Authentication and the least role privileges.

## Section 4.0 Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to use of the information, and the right to decline to provide information.

### **4.1. How does the project/program/system provide notice to individuals prior to collection?**

Store owners, when filling out applications to participate in the program, offer their information. Later, store information is collected and reviewed. As part of the application process the application data in some cases is verified with a visit to the store. Store owners (program applicants) are the source for the more sensitive privacy data. If they decline, their application cannot be processed.

### **4.2. What options are available for individuals to consent, decline, or opt out of the project?**

Store owners, when filling out applications to participate in the program, offer their information. Later, store information is collected and reviewed. As part of the application process the application data in some cases is verified with a visit to the store. Store owners (program applicants) are the source for the more sensitive privacy data. If they decline, their application cannot be processed.

### **4.3. PRIVACY IMPACT ANALYSIS: Related to Notice**

**Privacy Risk:** Failing to provide required notices as stipulated by the Privacy Act can result in legal penalties and regulatory scrutiny.

**Mitigation:** Clearly outline what personal data is being collected, the purpose of data collection, how it will be used, and who it will be shared with.



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## Section 5.0 Data Retention

The following questions are intended to outline how long information will be retained after the initial collection.

### 5.1. What information is retained and for how long?

STARS: All STARS information is retained and nothing has been purged.

STARS 3.0: Retailer records will be stored within the boundaries of the STARS 3.0 application following the migration of the database from Legacy to STARS 3.0. The specifics and duration of data storage/retention are to be determined later in the project.

### 5.2. Has the retention schedule been approved by the USDA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.

Yes. N1-462-09-9.

### 5.3. PRIVACY IMPACT ANALYSIS: Related to retention of information.

**Privacy Risk:** The longer PII is retained, the greater the risk of data breaches.

**Mitigation:** Use NARA data retention policies that outlines how long different types of PII will be retained and the rationale for those timeframes.

## Section 6.0 Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

### 6.1. With which internal organizations and/or systems is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

These users include, but are not limited to, the officials responsible for SNAP administration and investigation in FNS, the USDA Office of the Inspector General (OIG), SNAP State agencies as well as the State agencies administering the Women, Infants, and Children (WIC) Program.

All information collected is provided by the user (internal organization officials listed in 4.1) logging into the system using their approved credentials.

### 6.2. PRIVACY IMPACT ANALYSIS: Related to internal sharing and disclosure.

**Privacy Risk:** The risk of information sharing, PII being exposed while in transit.



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**Mitigation:** Employ robust security measures, such as encryption and secure transfer protocols, when sharing personal data to protect it during transmission.

## **6.3. With which external organizations (outside USDA) is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?**

The state SNAP and WIC agencies use this information. State Agencies use this information to investigate client and/or retailer fraud, to simplify the WIC retailer application process, and to assist in managing their respective areas of responsibility.

Each State Agency is required to have a security officer to manage requests and provide oversight related to State Agency system access. FNS regional and HQ security must also approve access to the system. The system is designed to be used across all sites with the same role-based access controls and safeguards at all sites.

## **6.4. PRIVACY IMPACT ANALYSIS: Related to external sharing and disclosure.**

**Privacy Risk:** Sharing PII with third parties increases the risk of unauthorized access, especially if those parties do not have adequate security measures in place.

**Mitigation:** Established clear policy outlining the conditions under which PII can be shared externally, including legal and compliance requirements (ex.: Computer Matching Agreements, SORNs, Business Agreements).

## **Section 7.0 Redress**

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about him or her.

### **7.1. What are the procedures that allow individuals to gain access to their information?**

Individuals may call the SNAP Retailer Service Center (RSC) to gain access to their information.

### **7.2. What are the procedures for correcting inaccurate or erroneous information?**

Individuals may call the SNAP Retailer Service Center (RSC) to correct inaccurate or erroneous information.

### **7.3. How are individuals notified of the procedures for correcting their information?**

Individuals may call the SNAP Retailer Service Center (RSC) to learn how to correct their information.

### **7.4. If no formal redress is provided, what alternatives are available to the individual?**

Individuals may call the SNAP Retailer Service Center (RSC) for redress options.