USDA Privacy Impact Assessment

Fiscal Year 2025

Privacy Division (PD)
Cybersecurity and Privacy Operations Center (CPOC)
U.S. Department of Agriculture

Revisions

Date	Version	Notes
09/06/2023	1.0	Documented created.
02/12/2025	1.1	Removed “Gender” and “Sexual Orientation” from Biographical Information in accordance with Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.”

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Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	Farm Loan Accounting and Allotments System (FLAAS)
Program Office	Deputy Administrator for Farm Loan Programs
Mission Area	Farm Production and Conservation (FPAC)/Farm Service Agency (FSA)
CSAM Number	1340
Date Submitted for Review	-

Mission Area System/Program Contacts

Role	Name	Phone Number
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System/Program Managers	N/A	N/A

Abstract

The Farm Loan Accounting and Allotments System (FLAAS) supports USDA's the Deputy Administrator for Farm Loan Programs. The programs provide direct and guaranteed Farm Ownership (FO) and Operating Loans (OL) to family-size farmers and ranchers who cannot obtain commercial credit from a bank, Farm Credit System institution, or other lenders. FLAAS uses the information collected to support the loan/grant making, servicing, and General Ledger and reporting requirements for farm loan programs. The PIA is being conducted because this system contains PII.

Overview

FLAAS is owned by the Deputy Administrator for Farm Loan Programs within USDA's FSA. The business purpose of the information technology (IT) system is to support the loan/grant making, servicing, and General Ledger and reporting requirements for farm loan programs. This relates to FSA's mission to serve all farmers, ranchers, and agricultural partners through the delivery of effective, efficient agricultural programs for all Americans.

The system, which users include members of the public, was created to provide an accounting system of record and official reporting mechanism supporting loan and grant programs for insured, direct, and guaranteed loans. Information is reported to the IRS for taxation purposes as legally required by Section 605OJ of the IRS Code. The programs make direct and guaranteed farm ownership (FO) and operating loans (OL) to family-size farmers and ranchers who cannot obtain commercial credit from a bank, Farm Credit System institution, or other lender.

It is estimated that approximately 115,000 individuals within FLAAS. The FLAAS application is the user interface used to record transactions and to analyze and correct rejected transactions(discrepancies). The application is also used to view borrower status information and detail the history of transactions processed to a borrower's account. FLAAS is currently comprised of 2 applications, which include the (1) Program Loan Accounting System (PLAS) and (2) Status of Allotment Ledger Accounts (SALA). SALA does not use any PII. PLAS use the customer's name, address and Social Security Number. These applications are an accounting system of record and official reporting mechanism supporting grants and insured, direct and guaranteed loans and provide agency accountants, accounting technicians and financial analysts with the ability to review, reconcile, and maintain financial information.

The legal authorities to operate the IT system include the Commodity Credit Corporation Charter Act** (15 USC 714 et seq.). The completion of this PIA will not result in changes to business processes or technological changes.

Section 1: Authorities and Other Requirements

These questions identify all statutory and regulatory authorities for operating the project, application, or system, including the authority for collection, which SORN applies, if an ATO has been completed, and if there is Paperwork Reduction Act coverage:

What legal authorities and/or agreements permit the collection of information by the project, application, or system?

The legal authority to permit the collection of information by FLAAS is Commodity Credit Corporation Charter Act** (15 USC 714 et seq.).

Has Authorization and Accreditation (A&A) been completed for the project, application, or system?

- Security Plan Status: Completed
- Security Plan Status Date: April 29, 2025
- Authorization Status: Authorized to Operate
- Authorization Status Date: April 12, 2024
- Authorization Termination Date: April 12, 2027
- Risk Review Completion Date: March 27, 2025
- FTPS 199 Classification of the System: Moderate

Which System of Records Notices (SORNs) apply to the information?

The following SORNs cover FLAAS:

- FSA-2 SORN Update in Federal Register Vol. 84, No. 56, Friday, March 22, 2019
- FSA-14 SORN Update in Federal Register Vol. 84, No. 56, Friday, March 22, 2019

Is the collection of information covered by the Paperwork Reduction Act?

FLAAS information collection is covered by the Paperwork Reduction Act. "Form FSA-2001 Request for loan making assistance" is subject to this Act. The approved OMB number is 0560-0237.

Section 2: Information Characterization

These questions define the scope of the information requested and collected, as well as the reasons for its collection as part of the project, application, or system being developed:

What information is collected, used, disseminated, or maintained in the project, application, or system?

Identifying Numbers:

- Social Security Number
- Taxpayer Identification Number

Biographical Information:

- Name (Including Nicknames)
- Home Address
- ZIP Code

What are the sources of the information in the project, application, or system?

The Automated Discrepancy Processing System (ADPS) obtains information from the customer, the State and County Office and State and County Automated Project (SCOAP), Financial Management Modernization Initiative (FMMI), Farm Service Agency (FSA), and Rural Development (RD). ADPS uses the customer's name, address, and Social Security Number. SALA does not use any PII.

How is the information collected?

ADPS receives information from customers, State and County Offices, SCOAP, FMMI, FSA, and Rural Development. SALA does not use any PII.

Does the project, application, or system use information from commercial sources or publicly available data? If so, explain why it is used.

N/A

How will the information be checked for accuracy? How often will it be checked?

Information is checked for accuracy by using Standard Accounting Practice of Balancing, Government of Accountability Office (GAO) Audit, Freedom of Information Act (FOIA); Edit validations. The WDC FLP Program Staff, Program Accounting Managers from FSA, and RD are responsible for assuring proper use of system data.

Does the project, application, or system use third-party websites?

No

What is the purpose of the use of third-party websites?

N/A

What PII will be made available to the agency though the use of third-party websites?

N/A

List the privacy risks and mitigations related to the characterization of the information.

Privacy Risk: The information collected contains sensitive PII, which if disclosed, would cause an unwarranted invasion of personal privacy.

Mitigation: The information is only disclosed to those responsible for the administration of the program or other entities that have legal authority to access the information. Users are required to authenticate their identity prior to accessing the information and access is restricted based upon user role.

Section 3: Information Uses

These questions delineate the use of information and the accuracy of the data being used.

Describe why and how the information collected, used, disseminated and/or maintained will support the project, application, or system's business purpose.

The information is used by ADPS to provide an accounting system of record and official reporting mechanism supporting loan and grant programs for insured, direct, and guaranteed loans. Information is reported to the Internal Revenue Service (IRS) for taxation purposes as legally required by Section 6050J of the IRS Code. SALA does not use any PII.

Does the project, application, or system 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.

Information is accessed on ADPS through online queries and batch processing using name or Social Security. No additional "tools" (other than the application and database itself) are used to analyze the data.

List the privacy risks and mitigations related to uses of the information.

Privacy Risk: Access to the data collected must be monitored to ensure safeguarding against unauthorized access and use.

Mitigation: Access to PII is determined by the owner of the information, user roles, and restricted access. Additionally, access will only be granted to the PII upon appropriate legal authority.

Section 4: Notice

These questions are intended to provide 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.

How does the project/program/system provide notice to individuals prior to collection?

Privacy Act Statements are placed on each form that collects PII. The statement notifies the individual of the authority to collect the information, what organizations may be legally authorized to receive it, how the information may be used, and individual's option to refuse to provide the information to USDA.

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

Individuals may decline to provide any of the information without penalty. However, refusing to provide some information could delay processing or result in the denial of their application. Users have the right to provide consent to access their information. To do so, the individual must make a written request to the information owner, system owner, or Privacy Officer to evaluate their request.

List the privacy risks and mitigations related to notice.

Privacy Risk: Inadequate Disclosure: Notices may fail to adequately inform individuals about how their personal information will be collected, used, and shared, leading to misunderstandings about privacy practices.

Mitigation: As a result of the information being connected to USDA FSA-2 and FSA-14, information in the system can be only accessed or disclosed upon legal authority or dictated routine use.

Section 5: Data Retention

These questions outline how long information will be retained after the initial collection.

What information is retained and for how long?

All records found in FLAAS are retained for 10 years and deleted only after the information is no longer needed for administrative, legal, audit or other operational purposes.

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

The retention schedule has been approved by the USDA records office and NARA. The Records Schedule Number fall under the Farmers House Administration: N1.096-91-001, N1-096-92-001, NC1-096-76-01, NC1-096-76-02, NC1-096-77-02, and NC1-096-78-01. See Farmers House Administration Records.

Privacy Impact Analysis: List the privacy risks and mitigations related to data retention.

Privacy Risk: The information contained in the records is sensitive, which could cause a privacy breach if not properly safeguarded.

Mitigation: Access and destruction of the information will only occur upon establishment of proper legal authority to access the data, pursuant the Privacy Act, Section 1619 of the Farm Bill, and the appropriate SORN(s) covering the information.

Section 6: Information Sharing

These questions define the content, scope, and authority for information sharing.

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

FLAAS supports all of FSA's and RD's 30 plus loan and grant programs for farm, business, and community development in rural areas. This major system contains the Agencies' official accounting records and is supported and maintained by the Finance Office and Information Systems Management in St. Louis. RD shares with Treasury, NFC, HUD IRS Dan & Bradstreet, US Bank Credit Bureaus, and Borrowers. Borrower information including loan account information.

List the privacy risks and mitigations related to internal information sharing and disclosure.

Privacy Risk: Unauthorized access to sensitive data could pose a risk to existing data and disclosure to unauthorized parties.

Mitigation: Information is electronic transmission of the data is encrypted, and access is only granted based on a user's role and active/inactive status.

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

FLAAS supports all of FSA's and RD's 30 plus loan and grant programs for farm, business, and community development in rural areas. Treasury, NFC, HUD IRS Dan & Bradstreet, US Bank Credit Bureaus, Borrowers – Borrower information including loan account information.

Processes include the following topics:

- Treasury Reporting - The DCIA processes evaluate accounts for amount and date of delinquency and reported to Treasury for offset (an offset is a treasury payment transferred to satisfy a debt instead of going to the recipient).
- IRS Reporting/Administrative Offset – Provides information to IRS for various reporting requirements which includes IRS tax refund offset to delinquent borrowers
- Credit Reporting – Provides information to Equifax, Dun & Bradstreet, and Experian
- Housing and Urban Development Reporting – Provides information to HUD for Credit Alert Interactive Voice Response System
- Deposit Fund Process – Facilitates the control and reconciliation of the deposits in the Agency collections clearing account. The system produces reports, which are used to reconcile Treasury deposits to processed and suspended cash transactions
- Collection Only Borrowers – Reports on borrowers coded for Collection Only servicing (an unsatisfied account that the borrower is legally liable for but the only servicing actions we accept are payments)
- Cost Items – NFC Interface

List the privacy risks and mitigations related to external information sharing and disclosure.

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

Mitigation: Due Diligence: Conduct thorough due diligence on third parties before sharing personal data, ensuring their privacy standards and practices are comparable to the PA and USDA requirements.

Section 7: Redress

These questions address the individual's ability to ensure the accuracy of the information collected about him or her.

What are the procedures that allow individuals to gain access to their information?

Should an individual wish to gain access to their information, they will need to make a written request to the system owner or FPAC FOIA Officer; to authenticate their identity and identity the records they request access to FLAAS.

What are the procedures for correcting inaccurate or erroneous information?

Individuals must make a written request to the system owner, information system owner or Privacy Officer, authenticate their identity, identify the portion(s) of the record that needs to be corrected and describe whether their information is inaccurate or erroneous. Upon receipt and review of the request, if it is verified a correction needs to be made, the record will be corrected and a sample of the document with the correction will be transmitted to the individual who made the request.

Requests to correct a record should be sent directly to a local or state FSA Office. All requests (1) must be in writing, (2) clearly identify the information that needs correction, (3) provide a reason why the information is incorrect, and (4) state what the correction should be.

How are individuals notified of the procedures for correcting their information?

In addition to normal notification through the SORN process, field technicians provide correction procedures to individuals upon request.

If no formal redress is provided, what alternatives are available to the individual?

Individuals may contact their administrative point of contact to obtain access to their information.

List the privacy risks and mitigations related to redress.

Privacy Risk: The system information provided by participants is important to be accurate, as it has an impact on their program participation. Incorrect information may adversely affect the participant or other individuals, resulting in denial of service or incorrect payments.

Mitigation: Individuals are provided with access to their information electronically to check for accuracy of their submission(s). Additionally, program staff will verify submitted information with the individual as well as previously collected data.

Section 8: Auditing and Accountability

These questions describe technical safeguards and security measures:

How is the information in the system/project/program secured?

The FLAAS employs a defense-in-depth strategy. Web applications are protected by web application firewall and restrictive networking. The application server is configured using Center for Internet Security hardened images and all components employ end point protection and real-time monitoring for malicious activity. Access to the system is role-based and requires multi-factor authentication for all accounts. All data transfer and storage utilize Federal Information Processing Standard (FIPS 140-2) compliant encryption.

What procedures are in place to determine which users may access the program or system/project, and are they documented?

Access to PII is determined by user role and restricted access. Access to PII is granted by appropriate legal authorities. Applicable user and roles are documented in the System Security Plan. FSA-13-A is used to request user access to USDA and FSA information technology systems including specifying authorization for accessing the system.

How does the program review and approve information sharing requirements?

Any time organizations outside of USDA requests access to information, a data sharing agreement is created and routed through the Grants and Agreements Office for review. The Grants and Agreements Office ensure all stakeholders, to include, but not limited to the FPAC Privacy Officer, a Senior Agency Official, and receiving organization official, review and sign the data sharing agreement that lays forth the standards and rules for handling USDA PII.

Describe what privacy training is provided to users either generally or specifically relevant to the program or system/project.

Annual organizational training, including USDA Information Security Awareness Training & Acknowledgment of Rules of Behavior, is mandatory for all federal and contractor staff working with FLAAS.