



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 Delivery and Credit Analysis System (FLD CAS)
Program Office	Information Solutions Division
Mission Area	Farm Production and Conservation (FPAC)/Farm Service Agency (FSA)
CSAM Number	1346
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 Delivery and Credit Analysis System (FLD CAS) supports the system supports [Farm Loan Programs \(FLP\)](#). The programs offer loans to help farmers and ranchers get the financing they need to start, expand or maintain a family farm. FLD CAS uses the information collected to field office staff with the ability to process and service loan applications. The PIA is being conducted because this system contains PII.

Overview

FLD CAS is owned by the Information Solutions Division within USDA's FPAC/FSA. The business purpose of the information technology (IT) system is to capture and process loan application data for farmers and producers. This relates to the FSA's mission to serve farmers ranchers, and agricultural partners through the delivery of effective, efficient agricultural programs for all Americans. The system, which users include farmers and producers, was created to help process and service loan applications. The FLP offers loans to help farmers and ranchers get the financing they need to start, expand or maintain a family farm.

It is estimated that approximately 933,531 individuals' information stored within FLD CAS. The system is currently comprised of the following 3 applications which include (1) Direct Loan System (DLS), (2) Electronic Debt & Loan Restructuring System (eDALR\$), and (3) Farm Business Plan (Web Equity Manager) (FBP). The applications:

- Provide field offices with the ability to process loan applications using the Loan Making application, service loans using the Loan Servicing application, and allow producers access to their Farm Loan Program (FLP) account information
- Assist authorized agency officials in determining and evaluating the effects of primary loan servicing in accordance with FSA Handbook 5- FLP
- Assist borrowers with obtaining Farm Loans and improving their farming business

The legal authority to operate the IT system include the Commodity Credit Corporation Charter Act (15 U.S.C. 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 FLD CAS is the Commodity Credit Corporation Charter Act (15 U.S.C. 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: March 12, 2025
- Authorization Status: Authorized to Operate
- Authorization Status Date: April 12, 2024
- Authorization Termination Date: April 12, 2027
- Risk Review Completion Date: March 17, 2025
- FIPS 199 Classification of the System: Moderate

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

The following SORNs cover FLD CAS: FSA-2 and FSA-14.

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

No

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
- Truncated or Partial Social Security Number
- File or Case ID Number
- Taxpayer Identification Number

Biographical Information:

- Name (Including Nicknames)
- Business Mailing Address (Sole Proprietor)
- Date of Birth
- Home Address
- ZIP Code
- Marital Status
- Personal Email Address
- Business Email Address

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

The information is supplied directly from the Service Center Information Management System (SCIMS), Farm Business Plan (FBP), Electronic Loan Deficiency Payments, Master Reference Tables (MRT), Appraisal System COTS (Appraisal), Program Loan Accounting System (PLAS) and Automated Discrepancy Processing System (ADPS). Other sources listed below do not have a direct connection to/from the application. Information is obtained through files etc.

- State and Local Agencies: County offices, Tax Records, Courthouse Records (UCC filings) and Deed Recorder.

Other Sources: Other lenders, credit reporting agencies, private appraisers, Crop insurance companies.

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

No

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

Data collected from the customer is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.

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 through the use of third-party websites?

N/A

List the privacy risks and mitigations related to the characterization of the information. Follow this format:

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.

- DLS: The collected information will be used to service existing loans, answer farm loan borrowers' inquiries and provide data on servicing loans to manage the program.
- eDALR\$: To assist field office employees in restructuring customer debt from loans originating from the USDA farm loan programs.
- FBP: To better assess each producer's financial situation and their goals for the future. The resulting formal business plan, outlining the details of the producer, is required to begin their loan eligibility decisions and processing.

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.

Not applicable

List the privacy risks and mitigations related to uses of the information. Follow this format:

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. Follow this format:

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 SORN 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 FLD CAS 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 is DAA-0145-2015-0014

List the privacy risks and mitigations related to data retention. Follow this format:

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.

Data Retention Policy: Use NARA data retention policies that outline how long different types of PII will be retained and the rationale for those timeframes.

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?

None

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?

None

List the privacy risks and mitigations related to external information sharing and disclosure. Follow this format:

Privacy Risk: N/A

Mitigation: N/A

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 FLD CAS.

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. Follow this format:

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, result 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?

Specific logging of transaction events (including who entered and when the transaction was completed along with type of financial transaction (such as loan activity, program payments, approvals, determinations, general or subsidiary ledger entries, etc.) and application parameter/table changes (such as loan rates, penalties, etc.) occur as part of the nightly process.

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.

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 ensures 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 FLD CAS.