

Privacy Impact Assessment

Farm Service Program Budget & Financial Services System (FSPB-FSS)

Policy, E-Government and Fair Information Practices

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**Privacy Impact Assessment for the
Farm Service Program Budget & Financial
Services System (FSPB-FSS)**
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Abstract

Name of the component and system: Farm Service Program Budget & Financial Services System (FSPB-FSS)

Farm Service Program Budget and Financial Services System (FSPB-FSS) provides subsidiary accounting and financial management functionality for FSA and Commodity Credit Corporation (CCC). This system supports the processing and tracking of payments, debt establishment and collection, funds control, general ledger accounting and financial reporting. Allows FSA to establish direct deposit accounts, assignments, and joint payments. Program and loan benefits are processed and disbursed through these systems to approximately 1.4 million FSA customers annually. FSPB-FSS delivers timely, accurate and relevant budget, financial and analytical information and procedural guidance to our customers and stakeholders that allows FSA to; execute the budget, develop and manage resources including the workforce.

Why the PIA is being conducted: To support federal law, regulations and policies.

Overview

- **System Name:** Farm Service Program Budget & Financial Services System (FSPB-FSS)
- **System Description:** Farm Service Program Budget and Financial Services System (FSPB-FSS) provides subsidiary accounting and financial management functionality for FSA and Commodity Credit Corporation (CCC). This system supports the processing and tracking of payments, debt establishment and collection, funds control, general ledger accounting and financial reporting. It allows FSA to establish direct deposit accounts, assignments, and joint payments. Program and loan benefits are processed and disbursed through these systems to approximately 1.4 million FSA customers annually. FSPB-FSS delivers timely, accurate and relevant budget, financial and analytical information and procedural guidance to our customers and stakeholders that allows FSA to execute the budget, develop and manage resources including the workforce.
- See question 1.6 for legal authorities.

Applications	Overview
CORE General Ledger System	CORE provides one system for FSA appropriated fund/administrative accounting and for CCC accounting.



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(CORE)	
FileNet Document Imaging System (FDIS)	FDIS resides at NITC, however is hosted by CEC Client Services and is a Commercial-off-the-Shelf (COTS) client-server Major Application (MA) that stores financial information images in the form of Tiff files. It allows for the input of pertinent Consolidated Financial Management Information Systems (CFMIS) investment documents for storage and retrieval.
Financial Inquiry Web Application (FI)	The FI resides on NITC Midrange Systems and is a web application designed to provide access to a producer's financial information on-line. The application provides enhanced customer service to producers by allowing instant access to financial information such as payments, collections, debt, and CCC-1099-G data. This reduces the need to request information from the local County Office. Producers have access to both summary and detailed information. County Office employees also have access to FI so employees can answer producer's questions and view financial information in the same format the producer is viewing.
Financial Management System - SCOAP (FMS-SCOAP)	FMS-SCOAP resides on NITC Mainframe and collects service center accounting transactions transmitted from the States and Counties via 1) eSCOAP, 2) National Payment Service (NPS), and 3) National Receipts and Receivables System (NRRS) and passes validated data to CCC CORE for the generation of accounting entries. FMS-SCOAP provides data transmission control, validation, as well as reporting functions for the Payment Management Office (PMO). In addition, FMS-SCOAP directs data to other mainframe and web applications. The files are created using data files on tape. The application provides on-line checks to ensure data meets pre-defined business rules and provides summary data to ensure all data is transmitted.
Financial Services System (FSAFS)	The Financial Services System resides on NITC Midrange Systems and is public facing, with producers and farmers able to update their own information (i.e. banking and assignment information). The system also provides service center employees the ability to create, edit and update assignments, joint payments and direct deposits for FSA customers/producers, and to set financial support flags necessary to maintain Bankruptcy Profiles, Other Agency Debt, Voluntary Withholdings and Involuntary Withholdings. Additionally, the system performs the following functions: • Validate information entered for single year or multiyear assignments. • Validate direct deposit banking information entered for producers and facilities. • Validate joint payment information entered for producers and facilities.



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	• Validate bankruptcy, other agency debt, involuntary/voluntary withholding information entered for producers/vendors and facilities. The agricultural data that is collected by the FSA State and County offices is managed in DB2. The data and relationships are organized in tables with designated keys that allow searches for specific field values. Data is received from SCIMS via Business Partner (BP) and vendor information is received from SAMS.
National Payment Services (NPS)	The National Payment Service resides on NITC Mainframe and NITC Midrange Systems and provides a web service for receiving, certifying and managing payment requests. A mainframe-hosted component organizes and submits these payment requests to Treasury for disbursement. Together, these components serve to verify and complete FSA program payments. In the process, NPS 1) ensures that program payments contain sufficient information to complete a customer program payment and have sufficient funding, 2) applies payments towards existing customer debt, 3) calculates and applies prompt payment interest penalty as necessary, 4) determines foreign person withholding as necessary, 5) determines the instrument for disbursing individual payments (check or direct deposit), 6) recognizes payment requests that require special handling (those involving assignments, joint payees, alternate payees or bankruptcy trustees), 7) provides a user interface to accomplish the special handling, 8) provides a user interface to accomplish two-party authorization ("certification" and "signing") of submitted payment requests, 9) bundles requests and prepares data for grouped payee payment statements and transmits it to a printing contractor for fulfillment, 10) creates accounting entries for FSA ledger system and 11) bundles requests and prepares data for transmission to Treasury for grouped payment fulfillment. (Individual entities frequently are designated for multiple payment requests on the same day, sometimes hundreds, which necessitates "rolling up" the issued payments and corresponding payment statements into single bundles for fulfillment.)
National Receipts and Receivables System (NRRS)	The NRRS resides on NITC Midrange Systems and NITC Mainframe (database only) and is a web-based accounting application for real-time processing and display of receivables and collections. It acts as an intermediary between source systems for receivable and collection records, and the accounting system or general ledger. A receivable is generated by National Payments System (NPS) and other program applications using NRRS Web Service that are sent to NRRS. Also, receivables are entered by county office users. A receivable is composed of multiple sub-balances, each of which is individually transmitted to the CORE Accounting System. NRRS generates letters to customers associated with a receivable and records the receipt of monies that have



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	been collected to satisfy a receivable.
National Receipts and Receivables System Notes (NRRS Notes)	NRRS Notes resides on the NITC Midrange Systems and is a web application which provides a method of processing promissory note agreement information, managing collections from producers and generating reports to update management, producers, and state and county offices. The application also generates various letters to producers (cc state/county offices) regarding the status of the Note. One or more Receivables can become a single Promissory Note agreement, and a single Promissory Note can be returned to one or more Receivables. Users access some of the reports from the Financial Web Application Data Mart (FWADM). The system data source comes from user input only. Output from the system consists of reports about debt and letters to producers concerning their debt. Receivable Management Office (RMO) prints and mails the letters to the producers. Letters can be generated as a result of the RMOs actions within the system. Delinquent letters are generated out of a weekly process.
NRRS Referrals (NRRS-RFLS)	NRRS-RFLS resides on NITC Midrange Systems and is a web-based application used to maintain the various referral statuses and to refer the Treasury Offset Program (TOP) and Cross-Servicing Program receivable debt information to Treasury. Data sources include information from 1) FSA Program Loan Accounting System (PLAS) about farm loans, 2) FSA National Receipts and Receivables Systems for debt information, and 3) Treasury TOP and CROSS Servicing systems. Data is sent to the United States Treasury Department as a result of the NRRS-RFLS processing. Reports generated relate only to the imported data and errors or exceptions that caused some data to fail to be imported. There are reports for the three different import types, PLAS, TOP, and CROSS.
Producer Payment Reporting System (PPRS)	PPRS resides on the NITC Mainframe and NITC Midrange Systems, and records IRS reportable payments made to producers, and provides a wide range of reports to various organizations inside and outside the FSA. The objective of the system is to provide 1) accurate accounting to producers, in January of each year, 2) corrected 1099G-1's if applicable, and 3) IRS reportable payments made to each producer during the previous calendar year. Payment data is summarized and provided to the IRS for payments made to producers. A statement of earnings is prepared for each producer for tax reporting purposes. Correction cycles, requested by Program Financing and Reporting Group (PFRG) within the Office of Budget and Finance (OBF) as needed, are also provided throughout the year. Correction cycle processing provides producers and the IRS information reflecting any adjustments to producer payments received in the system after the year-end cutoff.



Section 1.0 Characterization of the Information

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

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

Applications	Information is collected, used, disseminated or maintained in the system.
CORE	The CORE system occasionally contains Name as a DSUB fields. The CORE system almost never contains SSN. It won't contain SSN once the FSFL system is converted to DSL and no longer sends to CORE.
FDIS	Images could contain information such as: Name, street address, SSN/TIN, phone number, Claim/NRRS number, agency case number, promissory number, bank account number, schedule of deposit numbers and image of the signature.
FI	Name, SSN/TIN, financial institution account number, check number, and routing number.
FMS-SCOAP	Name, Address, TIN/SSN, bank routing number, and bank account number, bank info is stored/collected and used but not displayed.
FSAFS	Name, street address, SSN/TIN, bank account number, agency assigned number
NPS	Name, street address, SSN, and bank account number.
NRRS	Name, TIN/SSN
NRRS Notes	Name, TIN/SSN
NRRS-RFLS	Name, TIN/SSN
PRRS	Name, Address, TIN/SSN.

1.2 What are the sources of the information in the system?

Applications	Sources of information in the system.
CORE	Manual Input to CORE by system accountants in WDC and Kansas City. Automated feeder Input to CORE from other systems.
FDIS	KCFRB Imaging (FRB) downloads and imports Federal Reserve Bank images into the system. RCMA data is user input from document storage, fax and scanned materials. All data is input by the Receivable Management Office (RMO) staff and utilizes IBM/FileNet P8 storage areas.
FI	Producers, vendors.
FMS-SCOAP	Data is being sourced from National Payment Services (NPS), Data Control System (DCS), and National Receipts and Receivables System (NRRS), and S36/AS400 systems located in state and county offices



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FSAFS	Producers, vendors.
NPS	Producers, vendors.
NRRS	Financial Services, National Payments System (NPS), Manual system input from FSA field agent
NRRS Notes	Manual input from system users.
NRRS-RFLS	Government Payment Off-set Processing (TOP), Treasury Cross Servicing (CROSS), Program Loan Application System (PLAS), National Receipts and Receivables System (NRRS) and Manual system input from FSA Field Agent.
PPRS	Manual input from County via System 36. National Payment System (NPS) data is merged with county office transmissions and are transmitted to PPRS

1.3 Why is the information being collected, used, disseminated, or maintained?

Applications	Why information being collected, used, disseminated or maintained.
CORE	CORE is the system of record that provides information for the Financial Statements.
FDIS	The FileNet Document Imaging Systems (FileNet) is a Commercial-off-the-Shelf (COTS) client-server application that stores financial information images in the form of Tiff files. It allows for the input of pertinent Consolidated Financial Management Information Systems (CFMIS) investment documents for storage and retrieval.
FI	Allows instant access to financial information such as payments, collections, debt, and CCC-1099-G data.
FMS-SOAP	To provide validated data to CORE and other applications for the generation of accounting entries. Other applications are as listed: GIMS, PPRS, CAS, CASH, CRES, CCC-CORE, PCS, PLAS, NRCS, NPS, and NRRS.
FSAFS	To allow the customers to be paid either by check or direct deposit through National Payments System (NPS) and receive 1099's, notices of changes of banking, and transaction statements.
NPS	Information is used to facilitate the processing of eligible payments for producers/farmers or vendors.
NRRS	The information is collected and used by the Receivable Systems to offset Federal payments, wage garnishment, and referral to collection agencies. Also, the information is used to report delinquent debt for the purposes of creditworthiness. Commercial Credit Bureaus are supplied delinquent debt status via encrypted e-mail attachment.
NRRS Notes	Same as for NRRS (see above).
NRRS-RFLS	Same as for NRRS (see above).



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PPRS	Payment data is summarized and provided to the IRS for payments made to producers. A statement of earnings is prepared for each producer for tax reporting purposes.
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1.4 How is the information collected?

Applications	How information collected.
CORE	Information is collected via automated feeder input from other systems or manual input by WDC and KC system accountants.
FDIS	All data is directly input by the user from document storage, faxed, and scanned materials. Additionally, FileNet controls the workflows and indexing associated with the financial information being imaged.
FI	From other applications.
FMS-SOAP	Information is collected from the customer (Farmers/Producers), Cotton Cooperatives, Peanut Marketing Association, banking institutions, and vendors.
FSAFS	Direct personal contact with the farmers and an enrollment process
NPS	Direct personal contact with the farmers and an enrollment process
NRRS	Imported from: Financial Services, National Payments System (NPS), Manual system input from FSA Field Agent, WEBSCM, Top and Cross Collection Batch Process and AE7 Batch Process (loan information from system 36).
NRRS Notes	Manual input from system users.
NRRS-RFLS	Imported from: CORE Accounting System, National Payments System (NPS), Manual system input from FSA Field Agent, WEBSCM, Top and Cross Collection Batch Process and AE7 Batch Process (loan information from system 26).
PPRS	Manual input from County via System 36. NPS data is merged with county office transmissions and are transmitted to PPRS

1.5 How will the information be checked for accuracy?

Applications	How information is checked for accuracy.
CORE, FDIS, FI FMS- SOAP, FSAFS, NPS, NRRS, NRRS Notes,	Upon data entry, customers and system users are required to review data for accuracy, relevancy, timeliness, and completeness upon initial entry into forms and system. Additionally, information is checked for accuracy when updates are required. Lastly, customers have the right to access their data for review and request corrections if their information is inaccurate.



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NRRS- RFLS, PRRS

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

Applications	Legal authority to collect information.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	• For FPAC-P, Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397, the Agricultural Act of 2014 (Pub. L. 113-79), the Agricultural Improvement Act of 2018 (Pub. L. 115-334), and the Coronavirus Aid, Relief, and Economic Security Act (CARES ACT) (Pub. L. 116-136) • USDA RCPP Program (http://www.grants.gov/view-opportunity.html?oppId=291192) • The Regional Conservation Partnership Program (RCPP) is authorized by Subtitle I of Title XII of the Food Security Act of 1985 (the 1985 Act), as amended by Section 2401 of the Agricultural Act of 2014 (the 2014 Act). The Secretary of Agriculture has delegated the authority to administer RCPP to the Chief of the Natural Resources Conservation Service (NRCS), who is Vice President of the Commodity Credit Corporation (CCC). NRCS is an agency of the Department of Agriculture (USDA). • USDA CAET program • USDA TSP Program: https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/technical/tsp/ • Privacy Act (5 U.S.C. 552a); • E-Government Act of 2002 (Pub. Law. 107-347, 44 U.S.C. §101); • Paperwork Reduction Act of 1995 (44 U.S.C. § 3501)

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Applications	Privacy risks and how mitigated.
CORE, FDIS, FI FMS-SCOAP,	• Privacy risks are minimal as privacy information is inputted only by partners and FPAC government employees that have access to the application. Under our current plan, users must be authenticated via USDA



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FSAFS, NPS, NRRS, NRRS Notes, NRRS- RFLS, PRRS	ICAMs e-AUTH system and authorized via USDA’s role-based authorization • The minimum amount of personally identifiable information is collected to satisfy the purpose of this system. The risks are mitigated using various control mechanisms, these include: ○ All users must be uniquely identified and authenticated prior to accessing the application. ○ Access to data is restricted. ○ Information is encrypted at rest and in transit. ○ Masking of PII ○ System audit logs are retained and reviewed weekly
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Section 2.0 Uses of the Information

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

2.1 Describe all the uses of information.

Applications	Uses of information.
CORE	CORE collects data via automated feeder input from other systems and manual input by WDC and KC system accountants. The State and County, NPS and NRRS is processed into the FSM-SCOAP systems summarized and passed to CORE vial a feeder input.
FDIS	It allows for the input of pertinent Consolidated Financial Management Information Systems (CFMIS) investment documents for storage and retrieval. All data is directly input by the user from document storage, faxed, and scanned materials. Additionally, FileNet controls the workflows associated with the financial information being imaged.
FI	The Financial Inquiries Web Site provides enhanced customer service to producers by allowing instant access to financial information such as payments, collections, debt, and CCC-1099-G data. Producers will have access to both summary and detailed information, thus reducing the need to request information from the local County Office.
FMS-SCOAP	Data is reformatted/validated and sent to CORE and the follow applications for the generation of accounting entries: GIMS, PPRS, CAS, CASH, CRES, CCC-CORE, PCS, PLAS, NRCS, NPS, and NRRS.
FSAFS	To allow the customers to be paid either by check or direct deposit through National Payments System (NPS) and receive 1099's, notices of changes of banking, and transaction statements.
NPS	To facilitate the processing of eligible payments for customers.
NRRS	The Department of the Treasury will use the information to offset Federal payments, wage garnishment, and referral to collection agencies. Also, the information is used to report delinquent debt for the purposes of creditworthiness. Commercial Credit Bureaus are supplied delinquent debt status via encrypted e-mail attachment. Debt Due Process Demand letters are generated to customers associated with a receivable and records the receipt of monies that have been collected to satisfy a receivable.
NRRS Notes	NRRS Notes is a web-enabled system is used for tracking and managing collections from Producers. NRRS Notes replaced the client-server system ACAS-Notes. NRRS Notes has the same function as ACAS-Notes although some reporting processes were not migrated but instead utilize the functionality of Enterprise Data Warehouse (EDW) Financial Web Applications Data Mart (FWADM).
NRRS-RFLS	The Department of the Treasury will use the information to offset Federal



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	payments, wage garnishment, and referral to collection agencies. Also, the information is used to report delinquent debt for the purposes of creditworthiness. Commercial Credit Bureaus are supplied delinquent debt status via encrypted e-mail attachment.
PRRS	The objective of the system is to provide: • Accurate accounting to producers, in January of each year. • Provide corrected 1099G-1 if applicable. • IRS reportable payments made to each producer during the previous calendar year. Payment data is summarized and provided to the IRS for payments made to producers. A statement of earnings is prepared for each producer for tax reporting purposes. Correction cycles requested by POB as needed throughout the year. Correction cycle processing provides producers and the IRS information reflecting any adjustments to producer payments received in the system after the yearend cutoff.

2.2 What types of tools are used to analyze data and what type of data may be produced?

Applications	Tools used to analyze data and what type of data produced.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	No additional “tools” (other than the application and database itself) are used to analyze the data.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

Applications	Why and how commercial or publicly available data is used.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	The system does not use commercial or public data.



2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

Applications	Controls in place to ensure information is handled in accordance with the above described uses.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	Access to the system and data are determined by business need and individual roles. Controls are in place to provide reasonable assurance that data integrity and confidentiality are maintained during processing. Controls in place to ensure the correct handling of information include the following: End users are correctly identified and authenticated according USDA and FSA 1) security policies for access managements, authentication and identification controls, 2) Audit logging is used to ensure data integrity; audit logging is performed at the Department-level used to ensure data integrity, 3) this application is in compliance with the FISMA and the security and privacy controls provided in the U.S. National Institute of Standards and Technology (NIST) Special Publication 800-53, Revision 4. If any residual risks are identified, they will be managed and reported via the FISMA mandated risk assessment processes.



Section 3.0 Retention

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

3.1 How long is information retained?

Applications	Time information is retained?
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	The information is retained indefinitely (permanent records).

3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

Applications	Retention period approved by component records officer and National Archives and Records Administration (NARA)?
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	Yes, in accordance with USDA Directive DR 3080-001: Appendix A: Scheduling Records and NARA 36 CFR B - Records Management, Title 7 - Agriculture; Subtitle B- Regulations of the Department of Agriculture, Chapter vii – Farm Service Agency, Department of Agriculture (Parts 700-799)

3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Applications	Risks associated with the length of time data is retained and how those risks are mitigated.
CORE, FDIS, FI FMS-SCOAP,	The retention period is based on a combination business need (i.e., how long do we need this information for our business process) and long-term usefulness. When records have reached their retention period, they are



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FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	immediately retired or destroyed in accordance with the USDA Record Retention policies and procedures. During this period, the stored information may be at risk for viewing by unauthorized parties, data loss or destruction and non-availability. Access to computerized files are protected by access control software, physical access controls and if warranted, password-protected. SORN USDA/FSA-2 States: Program documents are destroyed within 6 years after end of participation. According to Records Management DR3080-001 Disposition of Inactive Records: Records and other documents that are no longer sufficiently active to warrant retention in office space shall be removed as rapidly as possible by: (a) transfer to a Federal Records Center, or (b) transfer to a records retention facility meeting the requirements of 36 CFR Chapter 12, Subchapter B Records Management, Subpart K, 1228.224 through 1228.244, or (c) if authorized, by disposal. (See Appendix B – Records Disposition Procedures)
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Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

Applications	Internal organization(s) in which information is shared, what information is shared and for what purpose?
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

4.2 How is the information transmitted or disclosed?

Applications	Information transmittal / disclosure.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Applications	Privacy risks associated with the sharing and how they were mitigated.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS,	N/A



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NRRS Notes, NRRS-RFLS, PRRS	
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Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

Applications	External organization(s) is the information shared, what information is shared, and for what purpose?
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	No application information is being shared outside of the USDA environment.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

Applications	External PII sharing compatibility and SORN coverage, or legal mechanisms by which system is allowed to share PII.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A



5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

Applications	Externally shared information and security measures.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A - PII is not shared or disclosed with organizations that are external to the USDA

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Applications	External sharing privacy risks and mitigation.
CORE, FDIS, FI FMS- SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS- RFLS, PRRS	N/A



Section 6.0 Notice

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

6.1 Does this system require a SORN and if so, please provide SORN name and URL.

Applications	Individual notice prior to collection of PII information.
CORE, FDIS, FI FMS- SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS- RFLS, PRRS	Yes - FSA Records are subject to USDA/FSA-2 SORN - Farm Records File (Automated) and USDA/FSA-14 SORN - Applicant/Borrower. sorn_fsa2_2019.pdf(usda.gov) sorn_fsa14_2019.pdf(usda.gov)

6.2 Was notice provided to the individual prior to collection of information?

Applications	Individual notice prior to collection of PII information.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	Whenever a user submits their data to USDA, they will be presented with either a privacy statement on a form or portal upon each customer login. The privacy statement serves as notice to the individual, which details the type of information collected, the right to consent to the provide information, and their right to decline to provide their information. Data collected from other applications follow the same data collection protocol.

6.3 Do individuals have the opportunity and/or right to decline to provide information?

Applications	Individual's right to decline to provide PII information?
CORE, FDIS, FI FMS-SCOAP,	Upon submission of information via completed form or portal, customer have access to the privacy statement, which details their option and right to decline providing their information to USDA.



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FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	
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6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

Applications	Individual's right to consent to uses of PII and how exercised.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	Within the privacy statement on submitted forms and portals, customers review their option to consent to particular use of the information. The privacy statement also contains the SORN and SORN location, that thoroughly explains how USDA uses and shares the information provided. By signing the document, the customer exercises their right to consent to the use of their information. Additionally, the SORN explains that customers may provide written consent when they'd like USDA share their information to a specific entity, that's not already authorized by legal authority.

6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Applications	Notice to individuals and unawareness risk mitigation.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	Within the privacy statement that is provided for review when customers submit forms and/or complete portal submissions, notice is provided pertaining to what information is collected, the right to consent to provide information, and their right decline to provide their information. Additionally, the privacy statement contains the location of the associated SORN, which details all privacy concerns and rights pertaining the collected information. For users unaware of the use of their information, a mitigation strategy is customers may contact USDA at any time and be connected to the FPAC Privacy Officer, who will explain the collection and use of their information.



Section 7.0 Access, Redress and Correction

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

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

Applications	Individuals access to PII procedures.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	The privacy statement that is presented to customers upon submission of their information contains the location of the SORN associated with the data collected. The SORN provides instructions to the customer concerning how to gain access to their information. Specifically, the SORN states that individuals may make a written request to the system manager, mailed in an envelope with a letter marked "Privacy Act Request." The statement specifies that the customer must provide their name, address, zip code, name of the system of records, year of the request, and other pertinent information to help identify the file.

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

Applications	Correction of erroneous information procedures.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	The privacy statement that is presented to customers upon submission of their information contains the location of the SORN associated with the data collected. The SORN provides instructions to the customer concerning how to correct inaccurate or erroneous information found within their records. Specifically, the SORN states that individuals may make a written request to the system manager with the reason for contesting the accuracy of the information within their record, their proposed amendment to the inaccurate information, and supporting documentation that details how the information is inaccurate or erroneous. The statement specifies that the customer must provide their written statement with their name, address, zip code, name of the system of records, year of the records in question, and any other pertinent information to help identify the file.

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

Applications	How individuals notified of correction procedures.
CORE, FDIS, FI FMS-SOAP,	Upon submission of customer information on forms or via portal submissions, they are provided with a privacy statement. The privacy statement provides the location of

FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	the SORN, which acts as the notification to the customers concerning the procedures for correcting their information.
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7.4 If no formal redress is provided, what alternatives are available to the individual?

Applications	Alternatives available to individual if no redress.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	If no redress is provided, customers may contact the agency Privacy Officer for any questions concerning their information.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

Applications	Privacy risks associated with redress and risk mitigation.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	A privacy risk associated with the redress available to an individual is a third-party request for that individual's information. The risk is mitigated by review of the request to ensure there is proper legal authority for the information to be disclosed.



Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

Applications	Access procedures and documentation.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	FSA-13-A is used to request user access to USDA and FSA information technology systems including specifying authorization for accessing the system. (Refer to Notice IRM-440) In addition, access to FSA web applications is gained via an on-line registration process similar to using the FSA-13- A form. For system specific detailed access see SSP.

8.2 Will Department contractors have access to the system?

Applications	Contractor access.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	- Yes, Department contractors with a need to know will have access as part of their regular assigned duties. Contractors are required to undergo mandatory background investigations commensurate with the sensitivity of their responsibilities, in compliance with Federal requirements and must obtain Level 2 eAuthentication access - As part of the FPAC onboarding process, contractors must meet all requirements for access to applications. Through the USDA Rules of Behavior, they are not allowed to download, share, store or print any USDA specific data. - All roles are approved on a need-to-know basis via FPAC BC management - Contractors are required to sign NDAs as per the USDA FPAC BC Onboarding process

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

Applications	User privacy training.
CORE, FDIS, FI FMS-SCOAP,	Once hired, privacy training and security awareness training is completed prior to gaining access to a workstation. The privacy training addresses user's responsibilities to protect privacy data and how to

FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	protect it.
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8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Applications	Certification & Accreditation.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	- FIPS-199 Security Categorization of system = Moderate - Date initial ATO was granted = 5/11/2016 - Date current ATO was granted = 5/10/2019 - Date current ATO expires = 5/10/2022

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

Applications	Auditing measures and technical safeguards.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	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.) occurs as part of the nightly process.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Applications	Privacy risks identified and risk mitigation.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS,	The main risk associated with privacy is the exposure to unauthorized access to privacy information. This risk is considered moderate. Mitigating controls are in place to ensure privacy risks are minimal. Mitigated controls are mapped back to SSP in CSAM. Quarterly access reviews are done to ensure controls are mitigated.



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NRRS Notes, NRRS-RFLS, PRRS	
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Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

Applications	Project / System type.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	Major Application

9.2 Does the project employ technology which may raise privacy concerns? If so, please discuss their implementation.

Applications	Technology privacy risks.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	No



Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?

Applications	SO and/or ISSPM review of Web guidance.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	Yes, no 3rd party website (hosting) or 3rd party application is being used.

10.2 What is the specific purpose of the agency’s use of 3rd party websites and/or applications?

Applications	Purpose of 3 rd -party websites and/or applications?
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

10.3 What personally identifiable information (PII) will become available through the agency’s use of 3rd party websites and/or applications.

Applications	PII availability through 3 rd -party websites and/or applications.
CORE, FDIS, FI FMS-SCOAP,	N/A



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FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS

10.4 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be used?

Applications	Use of PII available through 3rd party websites and/or applications.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

10.5 How will the PII that becomes available through the agency's use of 3rd party websites and/or applications be maintained and secured?

Applications	Maintenance and security of PII available through 3rd party websites and/or applications.
CORE, FDIS, FI FMS-SOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

10.6 Is the PII that becomes available through the agency's use of 3rd party websites and/or applications purged periodically?

Applications	Periodic purging of PII available through 3rd party websites and/or applications.
CORE, FDIS, FI FMS-SOAP, FSAFS,	N/A



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NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS

10.7 Who will have access to PII that becomes available through the agency's use of 3rd party websites and/or applications?

Applications	Access to PII available through 3rd party websites and/or applications.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

10.8 With whom will the PII that becomes available through the agency's use of 3rd party websites and/or applications be shared - either internally or externally?

Applications	Internal / external sharing of PII available through 3rd party websites and/or applications.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

10.9 Will the activities involving the PII that becomes available through the agency's use of 3rd party websites and/or applications require either the creation or modification of a system of records notice (SORN)?

Applications	SORN requirements for sharing of PII available through 3rd party websites and/or applications.
CORE,	N/A



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FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	
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10.10 Does the system use web measurement and customization technology?

Applications	Web measurement and customization technology.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

Applications	User rights for web measurement and customization technology.
CORE, FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	N/A

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

Applications	3rd party websites and/or applications privacy risks and mitigation.
CORE,	N/A



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FDIS, FI FMS-SCOAP, FSAFS, NPS, NRRS, NRRS Notes, NRRS-RFLS, PRRS	
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