Office of the Chief Information Officer
U.S. DEPARTMENT OF AGRICULTURE

USDA Privacy Impact Assessment

Fiscal Year 2024

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	Automated Multi-Family Accounting System (AMAS)
Program Office	Technology Office
Mission Area	Rural Development
CSAM Number	2110
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Mission Area System/Program Contacts

Role	Name
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Abstract

The Automated Multi-Family Account System (AMAS) is an online transaction entry that serves as a loan and origination system. AMAS provides tracking and servicing capabilities for USDA RD's Multi-Family Housing (MFH) loans and grants. This PIA is required for AMAS because the system processes personally identifiable information (PII) from individuals.

Overview

Automated Multi-Family Accounting System (AMAS) is an online transaction entry and inquiry financial and accounting system. AMAS processes loan obligations and disbursements, loan closing and loan servicing, including calculating and applying rental assistance and cash application, and general ledger and financial reporting. The purpose of AMAS is to support the Multi-Family Housing (MFH) direct loan and grant program and share information with Farm Loan Accounting and Allotments System (FLAAS) under the USDA Farm Production and Conservation (FPAC) mission area. AMAS provides loan making and servicing capabilities for approximately 23,000 loans.

AMAS functionality includes cash tracking, general ledger files, online inquiry and transaction input; loan making and loan servicing transaction updates; acquired property inventory & location lookup; daily register, balancing, and program reporting; and fiscal and financial reporting.

AMAS had both internal and external users. Internally, RD field offices, USDA National Office, Servicing and Asset Management Organization, and RD Finance Office use AMAS. Externally, AMAS is used to fulfill information requests from: Freedom of Information Act (FOIA) applicants, General Accounting Office (GAO), Office of Inspector General (OIG), Office of Management and Budget (OMB), and Congress.

Section 1: 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.

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

- Consolidated Farm and Rural Development Act (7 U.S.C. §1921, et. seq.) and Title V of the Housing Act of 1949 as amended (42 U.S.C. §1471, et. seq.)
- Farm Bill Act 2018 (P.L. 115-334)
- Fair Credit Reporting Act, 15 U.S.C. §1681f
- Consumer Credit Protection Act, 15 U.S.C. §1601, et. seq.
- Equal Credit Opportunity Act, 15 U.S.C. §1691, et. seq.
- The Fair Debt Collection Practices Act, 15 U.S.C. §162, et. seq.
- 7 CFR Part 3550, Direct Single Family Housing Loans and Grants
- 7 CFR Part 3555, Guaranteed Rural Housing Program
- 7 CFR Part 3560, Direct Multi-Family Housing Loans and Grants

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

Yes, approved 10/6/2025.

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

The system is covered by SORN USDA/RD-1, Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs.

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

No

Section 2: 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.

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

Identifying Numbers:

- Social security number
- File/Case ID number
- Taxpayer identification number

Biographical Information:

- Name (including nicknames)
- Ethnicity
- Home address
- Race
- Marital status
- Military service information

What are the sources of the information in the system/program?

RD program participants (borrowers and grantees) provide their information.

How is the information collected?

AMAS information is collected from the application forms submitted by the borrower, voucher holder, and voucher landlord.

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

No

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

- AMAS loan and grant applications are manually reviewed by the authorized RD area specialist to verify the accuracy of the data as part of the standard workflow process. If an RD applicant or RD customer notices any data inaccuracy, then they can reach out to the RD area specialist to get the necessary correction made to the AMAS loan or grant information.

Does the system/program use third-party websites?

No

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

N/A, AMAS does not use 3rd party websites or applications.

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

N/A, AMAS does not use 3rd party websites or applications.

Privacy Impact Analysis: Related to characterization of the information.

Privacy Risk

Misclassification of Data: Incorrectly categorizing PII which can lead to inadequate protection measures, exposing sensitive data to unauthorized access or misuse.

Mitigation

Data Classification Policy: Adhere to departments data classification policy that categorizes PII based on sensitivity and the potential impact of unauthorized access or disclosure.

Section 3: Uses of the Information

The following questions are intended to clearly 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 program's business purpose?

AMAS loan and grant information is used to support the RD mission and business needs of providing financial services to support economic development and support to rural areas. AMAS information is shared with Treasury to meet IRS reporting and comply with financial regulations for federal agencies.

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.

Not applicable, AMAS does not use tools.

Privacy Impact Analysis: Related to uses of the information.

Privacy Risk

- **Unauthorized Use of Data**: PII may be used for purposes other than those for which it was collected, violating privacy principles and user expectations.
- **Data Misuse**: Employees or third parties may misuse PII, either intentionally or unintentionally, leading to breaches of confidentiality and trust.
- **Inadequate Consent**: If individuals are not adequately informed about how their data will be used, or if consent is not appropriately obtained, it can result in legal non-compliance and ethical concerns.

Mitigation

- **Purpose Limitation**: Clearly define and communicate the specific purposes for which PII is collected and used, ensuring that it is not used for unrelated purposes without consent.
- **Data Minimization**: Collect and use only the minimum amount of PII necessary to achieve the intended purpose, reducing the risk of misuse.
- **User Consent**: Obtain explicit consent from individuals before using their personal information, particularly for purposes that go beyond the original intent of collection.
- **Transparency**: Inform individuals about how their personal information will be used, including any potential secondary uses, through clear and accessible privacy notices.
- **Regular Training**: Provide regular training for employees on privacy laws and the importance of adhering to the defined uses of personal information to ensure compliance.

Section 4: Notice

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

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

Notice is provided to the individual prior to the collection of information through the use of Form RD 410-9, Statement Required by the Privacy Act, which is provided before an RD applicant applies for an AMAS loan or grant.

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

Individuals have the opportunity and/or right to decline to provide information, but if they decline, then they will not be able to apply for the AMAS loan or grant. With the RD Form 410-9, Statement Required by the Privacy Act, individuals agree to provide the information, so RD applicants are aware of the collection of personal information.

Privacy Impact Analysis: 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.
- **Ambiguity**: If notices are unclear or overly complex, individuals may not fully understand their rights or the mission area's data practices, leading to a lack of informed consent.
- **Non-compliance with Regulations**: Failing to provide required notices as stipulated by the Privacy Act can result in legal penalties and regulatory scrutiny.

Mitigation

- **Clear Communication**: Ensure that privacy notices are written in clear, accessible language. Avoid legal jargon to make it understandable for all users.
- **Regular Updates**: Review and update privacy notices regularly to reflect changes in data practices, regulations, or business operations.
- **User Consent**: Implement mechanisms for obtaining explicit user consent for data collection and processing and provide options for users to withdraw consent easily.

Section 5: Data Retention

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

What information is retained and for how long?

AMAS records are unscheduled and thus permanent until scheduled.

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.

- The Multi-Family Housing Records Retention Record DAA-0572-2017-0007
- Rural Development Service (RDS) Administrative, and Program Records NC1-445-77-01

Privacy Impact Analysis: Related to retention of information.

Privacy Risk

Excessive Data Retention: Retaining PII longer than necessary can violate data minimization principles, increasing the risk of unauthorized access and exposure.

Mitigation

Until AMAS records are scheduled, the data is safeguarded in accordance with NIST 800-53 security controls and includes the physical, administrative, and technical controls described in the protected system security plan.

Section 6: Information Sharing

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

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?

Farm Production and Conservation (FPAC), Program Accounting System (PLAS), sends data to AMAS for cash tracking, general ledger files and location lookup. PLAS receives AMAS data to complete select reports and datasets. Data is transmitted between RD and FPAC via Secure FTP, Webservice or via Mainframe.

Privacy Impact Analysis: Related to internal sharing and disclosure.

Privacy Risk

Privacy risks include the potential compromise of PII data with AMAS.

Mitigation

This risk is mitigated with internal security and privacy controls outline in the System Security Plan. Access is limited to authorized personnel using E-Authentication. Audit logs are maintained to monitor activity.

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?

Experian: All data files sent from AMAS to Experian are transferred using Connect Direct via the DISC Mainframe. AMAS will be reporting MFH borrower loan information to Experian on a quarterly basis. This information will be incorporated into Experian's database and once incorporated will be Experian’s exclusive property. The loan information is sent as one of the provisions required by the USDA Debt Collection Improvement Act (DCIA) of 1996. PII data is passed including borrower name, address, phone number, account number, and taxpayer ID.

TWAI: Information shared: name, date/place of birth, address information, personal identification number, biometric data, criminal history, and photographic image/identifying characteristics; signed May 2023; for the purpose of ensuring timely transfer of funds from borrowers.

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk

Privacy risks include the potential compromise and unauthorized access of PII data.

Mitigation

This risk is mitigated with internal security and privacy controls outline in the System Security Plan and the ISAs. These measures enforce user authentication and authorization.

Section 7: Redress

The following questions are directed at an 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?

RD applicants have access to their AMAS loan or grant application information from the review and workflow processing by RD staff. The RD staff member will keep the RD applicant informed as to the status of their AMAS grant or loan application.

What are the procedures for correcting inaccurate or erroneous information?

If an RD applicant notices inaccurate information with their AMAS loan or grant application, then they will contact the RD area specialist for correction of any erroneous information. The RD area specialist will facilitate the correction of any inaccurate information for the RD applicant.

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

Notification is part of the application process for AMAS loan and grant applications, so the RD borrower/applicant can contact the RD area specialist to correct any inaccurate information. Also, RD area specialists involved in processing the loan or grant application do manual review and will contact the RD applicant for any information corrections with their AMAS loan or grant application.

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

Individuals have access, redress, and amendment rights under the Privacy Act and the Fair Credit Reporting Act.

Privacy Impact Analysis: Related to redress.

Privacy Risk

Lack of Transparency: Not providing clear information about how redress mechanisms work can create confusion and mistrust among individuals regarding their rights and the agency's accountability.

Mitigation

Establish Clear Procedures: Develop and communicate clear procedures for individuals to submit complaints or requests for redress related to privacy violations.

Section 8: Auditing and Accountability

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

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

Desk procedures document the process for establishing, activating, and modifying individual users for AMAS. The group and account types are defined by the System Owner for AMAS.

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

AMAS enforces user authentication and authorization to information contained within the system prior to granting the appropriate system access based on the user's pre-defined access level.

Authentication and authorization is documented with desk procedures and approved by the AMAS system owner.

How does the program review and approve information sharing requirements?

In accordance with National Institute of Standards and Technology (NIST) Special Publication (SP) 800-47, Security Guide for Interconnecting Information Technology Systems, Interconnections and ISAs are reviewed annually and will be re-signed every three years.

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

RD employees and contractors are required to undergo annual general privacy training.