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 |
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| System/Project Name | Guaranteed Loan System (GLS) |
| Program Office | Technology Office |
| Mission Area | Rural Development |
| CSAM Number | 2112 |
| Date Submitted for Review | 11/26/2025 |

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# Abstract

GLS records and manages obligations, servicing, and loss claims for guaranteed programs, as well as managing and monitoring lenders. GLS consists of eleven (11) internal modules that process PII: GLS Blockmode (Blockmode), Electronic Status Reporting (ESR), Farm Service Agency Guaranteed (FSAG), Guaranteed Annual Fees (GAF), Guaranteed Loan (GuarLoan), GLSmdb (mdb), GLS Services (Services), Guaranteed Loan Technology Branch (GLTB), Intermediary Relending Program (IRP), Multi- Family Housing Guaranteed (MFHG), and Single- Family Housing (SFH Loss). This PIA is required because PII data is being collected, processed, or stored in the GLS components and the PTA determined that a PIA is required.

# Overview

The Guaranteed Loan System (GLS) is one of Rural Development's official accounting and financial management systems which supports the Guaranteed and Direct Business & Industry program, Guaranteed Community Facility program, Guaranteed Rural Rental Housing program, Guaranteed Single Family Housing program - including SFH Loss, and the Guaranteed Water & Waste program in RD. It also includes the GuarLoan and the FSAG subcomponents. GLS is an online transaction entry and inquiry financial and accounting system accessed by over 700 field offices, the National office, and Finance office. Updates are done online real-time and through nightly batch processes. Field offices primarily use Guaranteed support functions, and the Finance office has overall operational, financial, and accounting responsibility for RD. External trusted partners (Lenders) provide loan status data via file uploads from Lender Interactive Network Connection to the mainframe during the monthly reporting periods.

GLS records and manages obligations, servicing, and loss claims for guaranteed programs, as well as managing and monitoring lenders. The following GLS applications process PII:

- Electronic Status Reporting (ESR) - (Hosted in the DISC Midrange environment). - Application for electronically capturing current loan status and delinquency information. Monitors USDA portfolio and lender performance. Provides reports on servers and default status on a monthly basis.
- GLS Components / Services
    - Farm Service Agency Guaranteed (FSAG) – Component including view only loan and credit bureau data. It can be accessed seven days a week via eAuth.
    - Multi-Family Housing Guaranteed (MFHG) - Component including loan origination, funds reservation, loan closing, losses, secondary market transactions, lender portfolio management, servicing actions, re-amortizations, consolidations, transfers, agency loan repurchases, liquidation expenses, interest credit payments, and status reporting.
    - Guaranteed Loan (GuarLoan) – GLS common or shared components used by loan programs within FSA and RD, including loan origination, funds administration, loan closing, annual fees, late fees, losses, secondary market transactions, lender portfolio management, servicing actions, re-amortizations, consolidations, transfers, agency

loan repurchases, liquidation expenses, interest assistance payments, status reporting, and credit bureau reporting.
    - GLSmdb – Component generates conditional commitment and loan closing forms and sends emails to the lenders with links to the forms.
    - GLS Services – A variety of services that interface with the GLS database and provide updates to borrower and loan data as well as annual fee amortization information.
    - GLS Blockmode – Component provides inquiry and update capability for GLS Security, GLS Loan Servicing, Electronic Fund Transfer, Messaging and Treasury Symbol data.
    - Guaranteed Loan Technology Branch (GLTB) - contains common Borrower functions for multiple loan programs and Loan Servicing functionality including re-amortizations, liquidation expenses, loss claims and Mortgage Recovery Advances repayment functionality.
- Guaranteed Annual Fees (GAF) – (Hosted in the DISC midrange environment) Component application provides an automated means to retrieve billing of annual fees for SFH guaranteed loans and allows submissions annual fee payment requests.
- Intermediary Relending Program (IRP) / Rural Business Relending Program (RLP) - (Hosted in the DISC midrange environment) Component provides loans to local organizations (intermediaries) for establishing revolving loan funds. These funds assist with financing business and economic development activities to create/retain jobs in disadvantaged/remote communities. Intermediate workers are encouraged to work in concert with State and regional strategies, and in partnership with other public and private organizations that can provide complimentary resources. It allows intermediary access to report the status of their recipients' loans and provide USDA financial reports via this site. Intermediaries can access it seven days a week via eAuth.
- Single Family Housing (SFH Loss) - (Hosted in the DISC midrange environment) Application automates the Guaranteed SFH Loss claims process by allowing lenders to electronically enter and transmit loss data and disburse loss payments to the lender via Electronic Funds Transfer (EFT). It allows for accurate and timely processing of SFH Loss claims data. While there is no direct interface to the LoanServ system, GLS places files on the mainframe which are accessed by LoanServ for claims applications. Files are currently empty as DCIA has been discontinued for RH Loans. Processing requirements for Automated Discrepancy Processing System (ADPS) collection of refunds and the GLS processing of lender payments are part of the GLS system as it relates to SFH Loss claims.

# 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?**

Information in the GLS application falls under the following:

- 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 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 12/9/2025.

**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
- Truncated or partial social security number
- Personal bank account number
- Business taxpayer identification number (sole proprietor)
- Business bank account number (sole proprietor)
- Personal mobile number

Biographical Information

- Name (including nicknames)
- Ethnicity
- Citizenship
- Home address
- Race
- ZIP code
- Home phone or fax number
- Marital status
- Personal financial information (including loan information)

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

GLS collects data from the following sources: Business Programs, Community Facilities, Multifamily Housing, Single Family Housing, Farm Service Agency, and Guaranteed Underwriting System 2 (GUS2).

**How is the information collected?**

RD Lenders and RD personnel enter information directly into GLS or GUS2. RD receives a monthly file of banking data from the U.S. Department of Treasury.

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

Not applicable, GLS does not use commercial or publicly available data.

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

Authorized RD staff manually review information to ensure that RD applicant/customer information and financial transactions are accurate and meet the RD business rules and USDA requirements.

There are many balancing processes that execute with every batch update cycle to validate the lender's loan portfolios. Balancing is done against general ledger, allotment summary, and check disbursement. The National Financial and Accounting Operations Center (NFAOC) within RD reviews these outputs daily.

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

No

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

Not applicable, GLS does not use 3rd party websites and/or applications.

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

Not applicable, GLS does not use 3rd party websites and/or applications.

**Privacy Impact Analysis: Related to characterization of the information.**

**Privacy Risk**

MODERATE RISK: The privacy risk centers on the potential unauthorized disclosure use of PII and the potential adverse consequences this disclosure or use would have on the RD customer.

**Mitigation**

The GLS system owner defines access roles to ensure separation of duties, account management and authorized access to data and information in GLS. Only authorized RD staff and RD partners (Lenders) can access the GLS application using verified account access. These measures mitigate the risks to privacy data in GLS.

# 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?**

GLS provides for the recording and management of loan obligations, servicing, and loss claims for guaranteed programs, as well as managing and monitoring lenders. GLS collects information to monitor USDA-guaranteed private sector lender's loan portfolios and to provide financial information on the GLS portfolio. The data is also used to determine eligibility and for consolidated reporting purposes, such as demographic data.

**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.**

GLS does not use tools to analyze data.

**Privacy Impact Analysis: Related to uses of the information.**

**Privacy Risk**

MODERATE RISK: The privacy risk centers on the potential unauthorized disclosure use of PII and the potential adverse consequences this disclosure or use would have on the RD customer.

**Mitigation**

GLS enforces user authentication and authorization to detect unauthorized access to information or transactions. The system is designed to confirm the identity of authorized GLS users prior to granting the appropriate system access based on the user's pre-defined access level.

# 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 3555-21. The borrower is required to sign/acknowledge prior to requesting a guarantee.

**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 on Form 3555-21.

**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.
- **Insufficient Updates**: Notices that are not regularly updated to reflect changes in data practices or legal requirements can mislead individuals and result in privacy violation.

**Mitigation**

Notice is provided on RD Form 3555-21 at the time of loan/grant application. Individuals are also notified in the SORN RD-1. Applicants are aware of the collection of personal information.

# 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?**

Borrower application records schedules are as follows:

- DAA-0572-2017-0001-0010 - 7 seven years
- DAA-0572-2017-0001-0005 (SFH Loss) – 7 years
- DAA-0572-2017-0008-0006 - 3 years
- DAA-0572-2017-0008-0007 - 7 years
- DAA-0572-2017-0007-0007 - 3 years

**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 borrower application records schedule has been approved by NARA.

**Privacy Impact Analysis: Related to retention of information.**

**Privacy Risk**

HIGH RISK: The risk is associated with the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the customer.

**Mitigation**

Access controls are in place to reduce unauthorized access. Mitigation requires the scheduling of GLS records.

# 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?**

GLS shares data with Farm Production and Conservation's mission area, Farm Loan Accounting and Allotments System (FLAAS) - Program Loan Accounting System (PLAS). FLAAS contains the Program Loan Accounting System (PLAS), which supports the loan/grant making, servicing, General Ledger and reporting requirements for program areas. GLS sends cash tracking and general loan ledger information, which includes Borrower's PII data, to PLAS monthly via SFTP.

**Privacy Impact Analysis: Related to internal sharing and disclosure.**

**Privacy Risk**

MODERATE RISK: Privacy risks include the potential compromise of PII data with GLS.

**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?**

GLS shares data via batch jobs with the following external organizations:

- Ginnie Mae: sends loan data information, such as the borrower's full name, loan account number, address information, lender name/address, and financial information for the purpose of documenting GLS obligations for mortgage-backed securities.
- Dun & Bradstreet BDES: GLS sends guarantee loan information, such as the borrowers' full name, lender names, addresses, date of reports, account number, TINs, amount of outstanding debt, type of debt, initiation date of debt, and maturity date to comply with Fair Credit and Reporting Act.
- US Treasury / TWAI: GLS sends loan account information, such as the borrowers' full names, lender names, addresses, account number, TINs, and amount of outstanding debt for the purpose of reducing government operating costs, providing greater functionality, and improving efficiency.
- Experian: GLS sends the borrower's name, SSN, address, and account information for the purpose of providing credit bureau reporting on individuals with Farm Servicing Agency (FSA) guaranteed loans.

**Privacy Impact Analysis: Related to external sharing and disclosure.**

**Privacy Risk**

MODERATE RISK: Privacy risks include the potential compromise of PII and sensitive financial information.

**Mitigation**

Risk is mitigated via the ICAs and MOUs governing the security practices and controls utilized to protect the information resources involved in the connection between the particular external organization and USDA GLS.

# 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?**

Individuals are also notified of the procedure to gain access to their information in the Record Access Procedures section as outlined in the SORN RD-1, Record Access Procedures. Individuals can reach out to authorized RD system users and lenders that have access to their information.

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

Procedures to correct their information are published in the Record Access Procedures section of the SORN RD-1.

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

Individuals are notified of the procedure to gain access to and contest their information in the Record Access Procedures section as outlined in the SORN RD-1.

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

N/A Redress is provided.

**Privacy Impact Analysis: Related to redress.**

**Privacy Risk**

- **Inadequate Processes**: If the processes for individuals to seek redress for privacy violations are unclear or cumbersome, it can deter individuals from exercising their rights and lead to unresolved complaints.
- **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.
- Redress is available to program participant as stated in question 7.1. There is no additional risk associated with the redress process available to users.

# 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?**

Access to the system(s) is controlled using eAuthentication to identify and authenticate the users.

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

GLS 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 are documented with desk procedures and approved by the GLS 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.