



Privacy Impact Assessment (PIA)

Farm Service Agency

Farm Service Information Management System
(FSIMS)

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Document Information

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Document Review				
Reviewer	Title	Date	Update: Y/N	If systemic, please provide comments

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Purpose of Document

USDA DM 3515-002 states: “Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews...” and “New systems, systems under development, or systems undergoing major modifications are required to complete a PIA.”

This document is being completed in accordance with NIST SP 800-37 Rev 1 which states, “The security plan also contains as supporting appendices or as references to appropriate sources, other risk and security-related documents such as a risk assessment, privacy impact assessment, system interconnection agreements, contingency plan, security configurations, configuration management plan, incident response plan, and continuous monitoring strategy.”

Abstract

Name of the component and system: Farm. Service Information Management System (FSIMS)

Brief description of the system and its function: The Farm Service Information Management System (FSIMS) allows FSA to efficiently store, organize and manage large amounts of information, which can be used for auditing, analysis and reporting purposes. FSIMS is comprised of the following applications:

- Enterprise Data Warehouse (Data Vault) (EDW DV)
- Legacy Informix Reporting Systems (INFOR)
- Oracle Reporting Systems (ORAC)

The Enterprise Data Warehouse (Data Vault) Names of Applications: a (EDW DV) is a consolidated data warehouse that provides information to FSA national, state, and county personnel. The Enterprise Data Warehouse is designed to facilitate data retrieval and reporting by providing a central stable location for data storage across FSA’s business enterprise. EDW DV defines, collects, validates, and stores data from various computer sources for each application to provide business users a single source for data used to resolve business inquiries.

EDW consists of five major architectural components:

- Oracle database – This is the database that houses the migrated and new data marts.
- Oracle Data Integrator (ODI), IBM DataStage, Informix Stored Procedures/Scripts – These are the ETL component used to transform the data from the sources into the Oracle database.
- Oracle’s OBIEE Reporting Tools – These are the reporting components used to provide application reports against Oracle and Informix data marts to FSA users through an intranet reporting portal.
- Informix database – This is the database that houses the FMRS and other legacy data marts and/or collection of tables that support business intelligence.
- Informix HPL - The HPL is a feature of the INFORMIX-Universal Server that allows you to efficiently load and unload very large quantities of data to or from an Informix database.

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

System Information

System Information	
Agency:	Farm Service Agency
System Name (Acronym):	Farm Service Information Management System (FSIMS)
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
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Overview

- **System Name:** Farm Service Information Management System (FSIMS).
- **System Description:** The Farm Service Information Management System (FSIMS) allows FSA to efficiently store, organize and manage large amounts of information, which can be used for auditing, analysis and reporting purposes.

FSIMS is comprised of the following applications:

- Enterprise Data Warehouse (Data Vault) (EDW DV)
 - Legacy Informix Reporting Systems (INFOR)
 - Oracle Reporting Systems (ORAC)
- **Typical Transaction:** Farm Service Information Management System (FSIMS) is not a transaction based system. EDW DV is a reporting system that consolidates existing FSA data. The data from source applications is currently residing in data marts in Informix database, and are being migrated to an Oracle DB. Apart from the migration, new data marts are created in an Oracle Database within the EDW DV. EDW DV will consolidate the data from source applications using the same process as current in the Informix DB (i.e. getting the data from source as flat files and using an extract transfer and load (ETL) process to load it into Oracle DB).

- **Information Sharing**

Applications	Overview
EDW DV	Enterprise Data Warehouse (Data Vault) (EDW DV) provides a consolidated reporting environment that provides timely, accurate and comprehensive FSA program information to FSA users. The EDW DV is a consolidated data warehouse that provides information to FSA national, state, and county personnel. The EDW DV is designed to facilitate data retrieval and reporting by providing a central stable location for data storage across FSA’s business enterprise. EDW DV defines, collects, validates, and stores data from various computer sources for each application to provide business users a single source for data used to resolve business inquiries.

- **Module & Component Description:**
See SSP section 9.1 for detail description
- **Legal Authority to Operate:**
 - The Commodity Credit Corporation Charter
 - Act (15 U.S.C. 714 et seq.) and Executive Order 9397

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.
EDW DV	All Program and financial data for the Agency is stored in the EDW. This includes Farm Program, Farm Loan, Commodity Operations, Human Resources and Financial data. Possible information contained in the databases, but not limited to; Name, date of birth, address, TIN/SSN, account numbers, employment history, misc. account numbers.

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

Applications	Sources of information in the system.
EDW DV	The EDW will extract transform and load information from multiple SAP source systems including MIDAS, WBSCM and FMMI, as well as non-SAP systems, such as Farm Records, GIS, Eligibility, and Financial data from SQL Server systems.

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

Applications	Why information being collected, used, disseminated or maintained.
EDW DV	The information is being collected to meet the reporting needs of the agency and comply with federal regulations and legislative mandates.

1.4 How is the information collected?

Applications	How information collected.
EDW DV	Most PII data collected from the producer at the county office and entered by the county office staff. In some cases information is collected via other federal agencies which provide this information to the FSA. This data resides in multiple source systems and is extracted from the source systems into the EDW.

1.5 How will the information be checked for accuracy?

Applications	How information is checked for accuracy.
EDW DV	Data collected from the producer is checked by the county office official entering the data. There are also data profiling efforts to verify the accuracy of the data after it is entered into the source system.

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

Applications	Legal authority to collect information.
EDW DV	Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397. Congress defines the requirements for the collection of information

	for participation in agency programs primarily through Farm Bills. Other regulations that govern the collection of information include the Food, Conservation and Energy Act of 2008, Federal Funding Accountability and Transparency Act.
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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.
EDW DV	<p>The privacy risks are moderate. The minimum amount of personally identifiable information is collected to satisfy the purpose of this system. The risks are mitigated using various control mechanisms. See below:</p> <ul style="list-style-type: none"> • All users must be uniquely identified and authenticated using FSA Form 13A process prior to accessing the application. • Access to data is restricted. • Access to the system and data are determined by business need and individual roles. • All FSIMS (EDW DV) data resides on Midrange Systems. Encrypting information at rest is performed by and inherited from Midrange Systems.

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.
EDW DV	Information in the EDW is used for Congressional, program level and end user reporting.

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.
EDW DV	Oracle Business Intelligence (OBIEE) and web based tools will be used to analyze the data. Data related to farms, producers, crops, and commodities.

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.
EDW DV	The EDW DV does not extract information directly from commercial sources. This information if obtained would be extracted from the source system.

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.
EDW DV	User login/eAuthentication EAS – Office IDs. 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: <ul style="list-style-type: none"> • End users are correctly identified and authenticated according USDA and FSA security policies for access managements, authentication and identification controls.

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?
EDW DV	The archiving and retention strategy for EDW DV will be retained in accordance with the NARA Retention Schedule.

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)?
EDW DV	Any deviations from the NARA Retention Schedule will be approved by NARA when the archiving and retention strategy is defined..

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.
EDW DV	<p>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.</p> <p>FSA2 SORN States: Program documents are destroyed within 6 years after end of participation. However, FSA is under a records freeze.</p> <p>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.)</p>

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?
EDW DV	FSA source systems (not EDW) share PII with NRCS, RD, and RMA.

4.2 How is the information transmitted or disclosed?

Applications	Information transmittal / disclosure.
EDW DV	FSA source systems shares the information through batch processes.

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.
EDW DV	<p>Farm Service Agency (FSA) performs a Privacy Impact Assessment (PIA) on EDW in accordance with OMB Memorandum 03-22 (http://www.whitehouse.gov/omb/memoranda_m03-22). The PIA is performed and updated as necessary:</p> <ul style="list-style-type: none"> • When a significant change creates new or different privacy risks. • And every three years as part of the information system Certification and Accreditation (C&A) process.

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?
EDW DV	EDW does not directly share information with external entities; However, FSA shares with IRS Treasury, one time data share with the University of Illinois, Dunn and Bradstreet (Name and address validation).

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.
EDW DV	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.
EDW DV	N/A

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.
EDW DV	<p>Farm Service Agency (FSA) performs a Privacy Impact Assessment (PIA) on Receivable in accordance with OMB Memorandum 03-22 (http://www.whitehouse.gov/omb/memoranda_m03-22). The PIA is performed and updated as necessary:</p> <ul style="list-style-type: none"> • When a significant change creates new or different privacy risks. • And every three years as part of the information system Assessment and Authorization (A&A) process.

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

Applications	Individual notice prior to collection of PII information.
EDW DV	Yes

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

Applications	Individual's right to decline to provide PII information?
EDW DV	N/A. PII is entered into the source system(s), not the EDW.

6.3 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.
EDW DV	N/A

6.4 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.
EDW DV	N/A

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.
EDW DV	Individuals will update their information through the source system(s) that the EDW extracts data from. All corrections will be addressed in the source system. As published in SORN USDA/FSA-2: Record access procedures: An individual may obtain information about a record in the system which pertains to such individual by submitting a written request to the above listed System Manager. The envelope and letter should be marked “Privacy Act Request.” A request for information pertaining To an individual should contain: name, address, ZIP code, name of system of record, year of records in question, and any 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.
EDW DV	As published in SORN USDA/FSA-2: Contesting record procedures: Individuals desiring to contest or amend information maintained in the system should direct their request to the above listed System Manager, and should include the reason for contesting it and the proposed amendment to the information with supporting information to show how the record is inaccurate. A request for contesting records pertaining to an individual should contain: name, address, ZIP code, name of system of record, year of 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.
EDW DV	Formal redress is provided via the FSA Privacy Act Operations Handbook.

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

Applications	Alternatives available to individual if no redress.
EDW DV	N/A

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.
EDW DV	The risk associated with Redress is considered moderate. The redress would have the same risks as the initial input of the data. The risk is mitigated as part of the system of records notice: USDA/FSA-2 - Farm Records File (Automated) and USDA/FSA-14, Applicant/Borrower. These risks are also mitigated by the Security Controls which are planned, in place, implemented, tested, and are operational.

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.
EDW DV	Access is granted through FSA's Form 13-A process which is documented on FSA's intranet.

8.2 Will Department contractors have access to the system?

Applications	Contractor access.
EDW DV	Department contractors do not have access to the System.

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

Applications	User privacy training.
EDW DV	Once hired and on an annual basis, privacy training and security awareness training is completed prior to gain and continue access to a workstation. The privacy training addresses user's responsibilities to protect privacy data through encryptions, protecting passwords, not sharing PII, etc.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Applications	Certification & Accreditation.
EDW DV	Yes, 04/19/2018

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

Applications	Auditing measures and technical safeguards.
EDW DV	USDA eAuthentication is the system used by USDA agencies to enable customers and employees to obtain accounts that will allow them to access USDA Web applications and services via the Internet. This includes things such as submitting forms electronically, completing surveys online, and checking the status of your USDA accounts. Please note that USDA will only accept eAuthentication Accounts from individuals. Currently USDA eAuthentication does not have the mechanism to issue accounts to businesses, corporations or other entities.

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.
EDW DV	The main risk associated with privacy externally 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. Internal risks are beyond the scope of this document. Quarterly access reviews are done to ensure controls are mitigated.

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.
EDW DV	Major Application

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

Applications	Technology privacy risks.
EDW DV	Yes, EDW DV allows for data extraction that internal users may misuse.

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.
EDW DV	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 3rd-party websites and/or applications?
EDW DV	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 3rd-party websites and/or applications.
EDW DV	N/A

- 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.
EDW DV	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.
EDW DV	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.
EDW DV	N/A

- 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.
EDW DV	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.
EDW DV	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.
EDW DV	N/A

10.10 Does the system use web measurement and customization technology?

Applications	Web measurement and customization technology.
EDW DV	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.
EDW DV	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.
EDW DV	N/A

Appendix A. Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the Farm Service Information Management System (FSIMS).

Gerald Pattillo
FSIMS Information System Owner

Date

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Information Systems Security Program Manager

Date

Amber Ross
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