

Privacy Impact Assessment

Electronic Debt and Loan Restructuring System (eDALR\$)

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the Electronic Debt and Loan Restructuring System (eDALR\$)

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Abstract

Name of the component and system: Electronic Debt and Loan Restructuring System (eDALR\$)

Brief description of the system and its function: Electronic Debt and Loan Restructuring System (eDALR\$) is an Intranet web-based program developed to assist authorized agency officials in determining and evaluating the effects of primary loan servicing in accordance with FSA Handbook 5-FLP. eDALR\$ completes a series of complex mathematical calculations based on information regarding the borrower's cash flow and loan status. This information is used in attempting to restructure the borrower's debt and maximize their repayment ability, while avoiding or minimizing loss to the Government.

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

Overview

System Name: Electronic Debt and Loan Restructuring System (eDALR\$)

- Agency: FSA
- System Purpose: a web based application (support tool) to be used by field office employees to assist in computing a debt restructuring plan. Web enabled version of eDALR\$ performs debt and loan restructuring analysis on distressed borrowers or delinquent government loans and went into production in April 2008.

Functionality includes:

- Determining and evaluating the effects of primary loan servicing
 - Completing a series of complex mathematical calculations based on information
 - Restructuring the borrower's debt and maximize their repayment ability
 - Accessing various other web applications for information.
 - Accessing the Farm Loan Program Information Delivery System (FLPIDS) Direct Loan System (DLS) database, Farm Business Plan (FBP) and the Master Reference Tables (MRT).
 - General System Description: The Electronic Debt and Loan Restructuring System (eDALR\$) is a web based application (support tool) that assists field office employees in restructuring customer debt from loans originating from the USDA farm loan programs.
 - Typical Transaction: The data consists of borrower information with regard to loan(s), financials, and security property
 - Information Sharing: N/A
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- Module & Component Description: N/A
- 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?

The data consists of borrower information with regard to loan(s), financials, and security property. Some examples of info collected is Name, Tax Id, and Borrower Case Id.

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

The Farm Service Agency/Customers/Borrowers.

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

To assist field office employees in restructuring customer debt from loans originating from the USDA farm loan programs.

1.4 How is the information collected?

Manual system input from FSA Field Agent.

1.5 How will the information be checked for accuracy?

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

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

Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397.

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



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:

- All users must be uniquely identified and authenticated prior to accessing the application.
- Access to data is restricted.



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.

To support field office employees in determining the most optimal servicing solutions applicable and available concerning the restructuring of customer debt from loans originating from the USDA farm loan programs.

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

No additional “tools” 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.

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.

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 security policies for access managements, authentication and identification controls.
 - Audit logging is used to ensure data integrity.
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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?

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)?

Yes, in accordance with USDA Directive DR 3080-001: Appendix A: Scheduling Records.

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

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. However, FSA is under a records freeze.

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.)



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?

N/A

4.2 How is the information transmitted or disclosed?

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.

N/A



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?

N/A

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.

N/A

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

N/A

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

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.

Yes. SORN USDA/FSA-2 and SORN USDA/FSA-14,
<http://www.ocio.usda.gov/policy-directives-records-forms/records-management/system-records>

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

Yes.

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

Yes. FSA Privacy Policy states that “Submitting information is strictly voluntary.”

6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

Yes, in accordance with FSA Privacy policy and the individual’s written consent.

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.

The risk is considered moderate. Notification is automatically provided in the system of records notice (Federal Register publication): SORN: USDA/FSA-2 - Farm Records File (Automated) and USDA/FSA-14 - Applicant/Borrower.



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?

As published in SORN USDA/FSA-2 and SORN USDA/FSA-14: "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 should contain: Name, address, ZIP code, name of the system of records, 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?

As published in SORN USDA/FSA-2 and SORN USDA/FSA-14: "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 should contain: Name, address, ZIP code, name of the system of records, 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?

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?

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.

The risk associated with redress is considered low, as the public does not have access to the system or the data. While the public cannot access the system to update or change their personal information, they may update their information



using form AD 2530 and submit to the appropriate FSA official. The FSA official will in turn update the system based on the information provided.

There is work going on for Customer Self Service which will be public facing. SCIMS is no longer the source of entry since Business Partner was implemented in December 2014.



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?

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?

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?

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 protect it.

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

Yes, 5/4/2015.

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

The logging/auditing mechanism is an inherited function. The Application does not generate its own log/audit information. Any logging and auditing of access, transactions or output is left to the OCIO-ITS, and eAuthentication Application.

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?

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.



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?

Major application

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

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”?

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?

N/A

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

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?

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?

N/A

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

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?



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?

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)?

N/A

10.10 Does the system use web measurement and customization technology?

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?

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.

N/A



Responsible Officials

Approval Signature

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