

# **Privacy Impact Assessment**

## **CLP Shared Services 2 of 7 - Business Intelligence (BI)**

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# **Privacy Impact Assessment for the CLP Shared Services 2 of 7 - Business Intelligence (BI)**

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## Abstract

Business Intelligence (BI) is a combination of applications at USDA that processes information for business intelligence purposes to support RD mission needs such as loan servicing, business analysis, data trending, and data analytics. This PIA is being completed because eFiche, FOCUS, Hyperion/EPM 11, TDW, and TRS process PII data and the PTA has determined that a PIA is required for these BI applications.

## Overview

The BI applications eFiche, FOCUS, Hyperion/EPM 11, CXO and TDW use PII data from members of the public that are documented in this PIA BI is an internal system that is not used or accessed by members of the public or non-federal entities.

**eFiche** is a non-web-based application that stores, reads, and retains reports generated by USDA enterprise-level accounting and reporting systems. eFiche allows the Government to maintain and research source documents including promissory notes, payment assistance agreements, etc., for a minimum of 40 years. The purpose of eFiche is to allow the Government to search stored information as well as the ability to perform selective printing, backup documentation and plans for offsite use.

**FOCUS** is a non-web-based application used for producing reports. The purpose of FOCUS is to provide a complete information control system with comprehensive features for entering, maintaining, retrieving, and analyzing data. RD mainly utilizes the end-user reporting features of the FOCUS software.

**Hyperion/EPM11** enterprise performance management (EPM) is a Commercial-Off-the-Shelf (COTS) application that provides canned reports as well as query and analysis capabilities using server-side Open Database Connectivity (ODBC) technology for centralized connectivity to a variety of data sources. Hyperion / EPM11 provides real-time and historical reporting against TDW and against live application data sources. The purpose of the COTS application is to provide RD users with access to various databases using a centralized database connection. EPM11 collects PII.

**CXO Tableau** is a Commercial-Off-The-Shelf (COTS) application that provides canned reports as well as query and analysis capabilities using server-side Open Database Connectivity (ODBC) technology for centralized connectivity to a variety of data sources. Deployment of the Tableau application server provides multiple users access to various databases using centralized database connections that have been established on the application server.

**TRS** provided RD users with access to various reports and dashboards. TRS supported query and analysis capabilities using pre-defined data sources that allowed RD users to analyze data with drag and drop functions. TRS is scheduled for decommission and no longer updated.

The **TDW** The Data Warehouse contains enterprise-wide data that is refreshed nightly from various on-line transactional processing (OLTP) systems. The purpose of the TDW is to provide critical business data effectively and efficiently, in an expedient manner for the RD decision-

makers to sustain their respective program missions. Department of the Treasury’s Treasury Web Application Infrastructure (TWAI) connects to via a virtual private network (VPN) and sends borrower information, such as full name, address, and financial data to TDW for reporting purposes. Data in TDW is read only and cannot be updated or changed by any user.

## 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?

eFiche, FOCUS, Hyperion/EPM 11, CXO, TRS, TDW process PII from program participants such as full names, mailing addresses, contact information, financial data, Social Security Numbers (SSNs)/Taxpayer Identification Numbers (TINs), miscellaneous identification numbers, and bank and loan information.

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

**eFiche:** LoanServ, Automated Multi-Family Housing Accounting System (AMAS), Program Loan Accounting System (PLAS), Farmer Programs (FP), Community Facilities (CF), Commercial Loan Servicing System (CLSS), Rural Business and Industry (B&I), Water and Environmental Programs (WEP) and Guaranteed Loan System (GLS). eFiche also receives reports directly from Hyperion/EPM 11, BI Publisher, and PFCS.

**FOCUS:** LoanServ, Automated Multi-Family Housing Accounting System (AMAS), Program Loan Accounting System (PLAS), Farmer Programs (FP), Community Facilities (CF), Commercial Loan Servicing System (CLSS), Rural Business and Industry (B&I), Water and Environmental Programs, (WEP) Cash Tracking and Guaranteed Loan System (GLS).

**Hyperion/EPM 11:** TDW.

**CXO:** TDW, DB2, Essbase, Postgres, MS Access.

**TRS:** TRS is scheduled for decommission and no longer receives data.

**TDW:** AMAS, CLSS, GLS, LoanServ, MFIS, PFCS, New Loan Originations, CPAP, ReConnect, and eServices, as well as from an external source, U.S. Department of Treasury’s Treasury Web Application Infrastructure (TWAI).

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

Information is collected for business intelligence purposes to support RD mission needs such as loan servicing, business analysis, data trending, and data analytics.

#### 1.4 How is the information collected?

BI is not the initial point of collection. All data is derived from other internal systems.

#### 1.5 How will the information be checked for accuracy?

RD staff that support **eFiche**, **FOCUS**, and **CXO** provide regular review as part of the standard business processes to check information in these applications for accuracy and provide any necessary corrections, if applicable.

**Hyperion/EPM11** data is checked internally by RD staff with validation queries to compare data loaded into the data warehouse tables to data content within the flat files.

**TRS** is scheduled for decommission and not checked for accuracy.

**TDW** data is checked internally by RD staff with validation queries to compare data loaded into the TDW tables to data content within the flat files.

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

Information in the BI application falls under the following:

- Privacy Act of 1974, as Amended (5 U.S.C. § 552a)
- OMB Circular A-130, Managing Information as a Strategic Resource, July 2016
- Freedom of Information Act, as amended (5 U.S.C. § 552)
- Federal Information Security Modernization Act of 2014 (also known as FISMA), (44 U.S.C. §3551), December 2014
- 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. o 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

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

**MODERATE RISK:** Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

**MITIGATION:** Data is stored in a secure environment. Authorization is required to access the applications.

## 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.

**eFiche** produces electronic copies of RD loan servicing and financial management reports.

**FOCUS** produces reports from RD loan servicing and financial management data located on the DISC mainframe. FOCUS provides information with comprehensive features for entering, maintaining, retrieving, and analyzing data from loans and financial management data.

**Hyperion/EPM11** provides canned reports as well as query and analysis capabilities to RD users. The applications access various databases using centralized database connections that have been configured on the application server. RD analysts can also build queries, reports, pivots, charts, and Executive Information System (EIS) dashboards to facilitate navigation and produce documents and reports.

**CXO** provides canned reports as well as query and analysis capabilities for RD users.

**TRS** provided RD users with access to various reports and dashboards. TRS supported query and analysis capabilities using pre-defined data sources that allowed RD users to analyze data with drag and drop functions. TRS is scheduled for decommission and not updated.

**TDW** is a data repository providing critical business data, in an expedient manner for the RD decision-makers to sustain their respective program missions.

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

**eFiche** does not use tools, so this is not applicable to this component.

**FOCUS** uses a software product, Information Builders, to analyze data and provide reports from the analysis. The reports have data analytics/business intelligence information.

**CXO** does not use tools, so this is not applicable to this component.

**TRS** is scheduled for decommission but utilized its own analytical reporting functionalities, including dashboard presentation tools.

TDW uses EPM to run queries and produce reports against TDW data. The reports have data analytics/business intelligence information to assist RD management.

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

N/A

**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.**

Controls are in place to detect unauthorized access and uses audit logs/security logs that track user login activity. E-Authentication or Active Directory authentication is used with the BI applications and there are audit logs that track user login activity.

## 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?**

Business Intelligence data is not scheduled and therefore held permanently.

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

No, discussions are underway with NARA to schedule BI 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.**

HIGH RISK: The risk associated with maintaining data permanently is high.

MITIGATION: RD is in the process of scheduling system records. Until data retention is scheduled, the data is safeguarded in accordance with NIST 800-53 security controls.

## 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?**

**eFiche, FOCUS, Hyperion/EPM11, and TDW**, share financial management information with Farm Service Agency (FSA) to support loan and grant origination and processing and for business analysis, data trending, and data analytics in support of the RD mission.

**TRS** is scheduled for decommission but received data from FSA.

**Hyperion/EPM 11** receives data from Enterprise Content Management (ECM) and TDW for reports. This application also conducts data analysis on predefined queries from loan servicing and financial management data sources

**TDW** receives data for reports and query and analysis from AMAS, CLSS, GLS, LoanServ, MFIS, PFCS, New Loan Originations, CPAP, ReConnect, APR, and ACR (eServices).

The information is processed for business intelligence purposes and utilized in reports and dashboards for business analysis, data trending, and data analytics.

#### **4.2 How is the information transmitted or disclosed?**

**eFiche, FOCUS, Hyperion/EPM11, TDW and CXO** transmit information electronically via PDF, Excel, and using encrypted data files. **TRS** is scheduled for decommission and no longer transmits or discloses information.

#### **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.**

**MODERATE RISK:** Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

**MITIGATION:** Data is stored in a secure environment. Access to the data is controlled by designated administrators, utilizing eAuthentication and Active Directory authentication to identify and authenticate the users. Data at rest and in transit is encrypted.

## **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?**

BI does shares data with U.S. Department of Treasury Fiscal Service Treasury Web Application Infrastructure (TWAJ). BI provides debtor and debt information for Treasury Offset Program and Cross Servicing, which is done for federal agencies. TWAJ shares the full name, address information, and financial account information to TDW for the purpose of providing RD management with data to assist decision making. An ISA between TWAJ and USDA agencies, including RD, governs and authorizes the sharing of federal financial information, as well as Privacy Act data, from TWAJ into these USDA systems, including TDW.

**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.**

System of Record Notice (SORN) RD-1, Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs, Routine Uses 3, 8, and 25.

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

An ISA between TWAJ and USDA RD authorizes this data exchange and details the security controls in place. SNA and TCP/IP traffic between Fiscal Service TWAJ Applications and BP are over a VPN Tunnel using AES-256 encryption, or an encrypted dedicated connection, or HTTPS (256-bit TLS) to registered IP addresses. For data transfer, RD must use Connect:Direct over the TWAJ File Transfer Gateway (FTG).

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

MODERATE RISK: Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

MITIGATION: Data is stored in a secure environment. Access to the data is controlled by designated administrators, utilizing eAuthentication and Active Directory authentication to identify and authenticate the users. Data at rest and in transit is encrypted.

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, 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: <https://www.govinfo.gov/content/pkg/FR-2019-05-14/pdf/2019-09874.pdf>.

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

Notice is provided to individuals by the initial source systems prior to collection or processing of the information. BI is not the initial point of collection.

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

Notice of opportunity and/or right to decline to provide information was provided to individuals by the initial source systems prior to collection or processing of the information.

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

Consent of the individuals for particular uses of the information would have been obtained by the initial source systems, if required, prior to collection or processing of the information.

**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.**

Notice was provided to individuals by the initial source systems prior to collection or processing of the information. The initial assessment of privacy risk would be performed by the administrators who manage the data at its collection.

## 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?**

Individuals are 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.

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

Individuals are notified of the procedure to correct to their information in the Record Access Procedures section as outlined in the SORN RD-1, Record Access Procedures.

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

Individuals are notified of the procedure to correct their information in the Record Access Procedures section as outlined in the SORN RD-1, Record Access Procedures.

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

N/A, individuals are notified of the procedure to correct their information in the Record Access Procedures section as outlined in the SORN RD-1, Record Access Procedures.

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

No additional risks are associated with the redress process. The requestor may also refer to the RD-1 SORN for additional information regarding Record Access Procedures.

## 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?**

The BI System Point of Contact (POC) assigns group membership and determines individual RD user access. The UAM Team creates, modifies, and deletes user requests approved by the System Point of Contact.

**8.2 Will Department contractors have access to the system?**

Yes, authorized RD contractors with a business need have access to a BI application as part of their regular assigned duties.

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

Yes, All RD employees and contractors are required to complete annual information security and awareness training, which includes privacy training.

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

Yes, BI has an Authorization to Operate (ATO) that expires on March 3, 2023.

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

BI complies with the Federal Information Security Modernization Act of 2014 (FISMA) by documenting the Authorization and Accreditation, annual control self-assessments, and continuous monitoring in accordance with National Institute of Standards and Technology (NIST) Special Publication 800-53. Access to FOCUS, Hyperion/EPM 11, CXO and TDW is controlled through Level 2 E-Authentication with audit logs of user activity for BI applications. eFiche access is controlled by Active Directory authentication.

**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?**

**MODERATE RISK:** Current risks are the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the borrower, if an individual, and on the tenant.

**MITIGATION:** Data is stored in a secure environment. Authorization is required to access the applications. Potential compromise of privacy data is mitigated via audit monitoring, annual training and awareness, and USDA network security protections in place to protect RD data for all BI applications.

## 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?**

Business Intelligence (BI) is a combination of applications at USDA that processes information for business intelligence purposes to support RD mission needs such as loan servicing, business analysis, data trending, and data analytics.

**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.

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

N/A

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

N/A

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

N/A

**10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> 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 3<sup>rd</sup> 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 3<sup>rd</sup> party websites and/or applications?**

N/A

**10.8 With whom will the PII that becomes available through the agency’s use of 3<sup>rd</sup> 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 3<sup>rd</sup> 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 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

N/A



## Approval Signature

Signed document on file.