Privacy Impact Assessment
Rural Development High Value Assets (RD-HVA)

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Abstract

As part of a Rural Development (RD), Technology Office Cyber Security Division (CSD) Initiative to reduce the number of Assessment & Authorization (A&A) systems, CSD developed the "Boundary Consolidation Project." The Project consolidated two (2) system boundaries into one (1), the RD High Value Assets (HVA) boundary. HVA now includes Multi-Family Integrated System (MFIS) and Enterprise Content Management (ECM).

Overview

As part of a Rural Development (RD), Technology Office Cyber Security Division (CSD) Initiative to reduce the number of Assessment & Authorization (A&A) systems, CSD developed the "Boundary Consolidation Project." The Project consolidated two (2) system boundaries into one (1), the RD High Value Assets (HVA) boundary. HVA now includes Multi-Family Integrated System (MFIS) and Enterprise Content Management (ECM).

Multi-Family Integrated System (MFIS) is designed to assist Servicing Office personnel in monitoring the management of Multi-Family rental properties. MFIS is an intranet application that provides the capabilities to track all the activities related to the management and servicing of the Multi-Family Housing (MFH) property. MFIS supports the Multi-Family Housing (MFH) direct loan programs which includes 15,900 projects with 23,000 loans. The projects consist of 450,000 units with 265,500 of the units receiving rental assistance. MFIS also includes borrower information and annual budget data. The following MFIS modules process PII: **MFIS, MINC, Mobile App, PAD**, and **Pre-Trac**.

1. **Multi-Family Integrated System (MFIS)** is an intranet application that provides the capabilities to track all the activities related to the management and servicing of the MFH property. MFIS reporting features include: collection and analysis of proposed year-end, monthly and quarterly actual and balance sheet budgets, supervisory activities, rental subsidy agreements, project units, rent schedules, and tenant reports. MFIS users are only USDA employees and contractors. MFIS application contains PII.

2. **Management Interactive Network Connection (MINC)** is an interactive system that collects project budget and tenant residency status information from management agencies and service bureaus either through XML files or directly into the fill-a-form section of the public facing website. The data collected is integrated into Multiple Family Information System (MFIS). The purpose of MINC is to provide business customers a portal to manage their properties, tenants, and payments. This application collects PII.

3. **MOBILE Application (App)** is an extension of MFIS available on portable PC laptops. The purpose of the Mobile App is to provide users the ability to capture and upload results during the annual physical supervisory visit/inspection of USDA properties. Annual inspection reports cover regulation compliance, tenant subsidy fraud, and general living conditions. The Mobile App collects PII.

4. **Pre-Authorized Debit (PAD)** is an interface between RD and US Treasury. The purpose of PAD is to ensure timely transfer of funds from borrowers to the Treasury. MFH and PLAS borrowers that mail paper checks to RD for the installment payments may register for PAD transactions. When a borrower registers for PAD, the payment is made via Electronic File

Transfer (EFT) from borrower's bank account or a designated management agent's bank account through Pay.Gov. Authorized RD personnel in MFH Servicing Offices and Finance Offices, Cash Management Branch use PAD. PAD collects and maintains PII, specifically full name, tax identification number (TIN) and bank routing/account number of loan payees if the borrower is an individual. This system services AMAS, PLAS and FSA loans.

5. **Pre-Trac** is an intranet database support system that allows the USDA RD state, county, or regional Servicing Office specialists to process Multi-Family Housing prepayment requests in accordance with RD Instructions 1965-E. The application assists the servicing office to track those projects requesting prepayment of their loan and determines if the project is needed. The general public does not have access to Pre-Trac. This system collects PII of tenants specifically, their name and address.

Enterprise Content Management (ECM) is web-browser based application that uses e-Auth Level 2 to verify user access and rights. The purpose of ECM is to provide RD correspondence and document management tracking from receipt to closure. ECM receives and collects documents from the general public, program participants, political officials, and internal employees and contractors. The ECM system consists of twenty-one (21) Modules (10 Active & 11 Inactive). These modules all use RD's Enterprise Shared Services hardware and software infrastructure. However, each presents a different user interface that has been customized and fine-tuned to meet a specific set of business requirements. The following process PII: **CMM, DCFO, SO, ePSF, GUM, MFH Housing Vouchers, OGC-CMM, AMS, MisPay, CAM, GRM, IPM, PAM,** and **RBS**.

ACTIVE MODULES
1) **Correspondence Management Module (CMM)** helps RD employees at any organizational level manage correspondence and other documents from initial receipt through completion and archival storage. The application workflow capabilities enable documents to be routed within or among RD agencies and offices for collaborative input or review, and a robust security scheme ensures that information is available only to authorized personnel. Easy-to-use search and report features are helping executives, managers, and other users find and display the information they need quickly and efficiently. This module processes PII.
2) **Deputy Chief Financial Officer Receipts Module (DCFO)** is used to track and store funds requests and receipts processed by the staff of the Deputy Chief Financial Officer for Rural Development in St. Louis. DCFO is used for processing these funds requests including pre-authorized debits, customer-initiated payments, and requests for wire transfer. This module processes PII.
3) **Servicing & Asset Management Office (SO)** Supports the Rural Development (RD) Business Center (BC), to process and track Community and Utilities (CUB) and Multi-Family Housing (MFH) programs. SO was formerly called DLGB. Everything from address updates to borrower correspondence is included. This module processes PII.
4) **Electronic Personal Security Folder Module (ePSF)** is used by the Office of Homeland Security and Emergency Coordination (OHSEC) to adjudicate contractor and USDA personnel security reviews by reviewing and analyzing investigations of USDA employee and contractor candidates and determining eligibility for Federal or Federal contractor employment. This module processes PII.

5) **General Use Module (GUM)** RD agencies and offices are utilizing the Enterprise Content Management (ECM) GUM to manage administrative processes. For example, RD uses GUM to track payments and tenant certifications, maintain a running case record for their accounts, and for general tasking of employees. GUM allows management to track documents, record actions taken, and utilize archival storage. This module processes PII.

6) **Multi-Family Housing (MFH) Vouchers** supports the MFH voucher program by providing workflows and a repository for the MFH voucher documents. (VAWS) This module processes PII.

7) **Office of the General Counsel Case Management Module (OGC-CMM)** Implemented in July 2012, the module was developed for the RD Office of the General Counsel (OGC) to track and update their legal cases and back-file documents and casework. Unique features of this module include a tickler reminder system, special position-specific security enhancement, drag and drop document capability, and a document repository specifically developed for back-file documents at OGC. This module processes PII.

8) **Account Management System (AMS)** – the Grain Inspection Packers and Stockyards Agency (GIPSA) utilizes AMS (previously referred to as Packers Stockyards Automated Systems (PSAS) module to track tasks and documents related to the various regulatory activities that their mission calls to be conducted on businesses in the livestock and poultry industries. These activities take the form of registrations, audits, investigations, and enforcements with standard workflows that have been defined for each. In addition, the PSAS module allows for the maintenance of data concerning the various businesses being regulated. These data elements listed below are used in support of the regulatory activities and include general information about the businesses as well as annual business volume, facilities, scales and bonding. This module processes PII (if sole proprietors).

INACTIVE MODULES

1) **Albuquerque Service Center Budget and Finance Miscellaneous Payments (MisPay)** (Currently Inactive) was used by the Forest Service to store documents related to payments made outside of the Integrated Acquisition System (IAS). Information stored in this module included vendor information including contract number, vendor name, address, and invoice amount. MisPay was last used Dec 2016 and contains PII (TIN & SSN).

2) **Content Analysis Module (CAM) (**Currently Inactive) was used by USDA agencies and offices to view public comments solicited by USDA on the 2007 Farm Bill. It allowed for automated analysis of constituent surveys and letters to identify and tabulate important issues and opinions. This module is inactive but could be modified to provide analysis on other topics. CAM was last used Feb 2009 and may contain PII in relation to the public comments (name, email, phone).

3) **Grants Review Module (GRM)** (Currently Inactive) was used by Rural Utilities Service (RUS) to track the review of broadband grant applications. RUS staff used the module to review the applications and approve/deny them. GRM was last used May 2018 and may contain PII (names and addresses).

4) **Invoice Processing Module (IPM)** (Currently Inactive) was used by USDA agencies and offices to store all USDA invoices in a centralized repository. This module assisted USDA employees with processing and tracking the status of the invoices and transmitting the invoices to the various USDA payment systems. IPM was last used May 2011 and contains PII (TINs and SSNs).

5) **Performance Appraisal Module (PAM)** (Currently Inactive) was used by Food and Nutrition Service (FNS) to store and access employee performance appraisals. This allowed FNS to free up physical space in their offices. PAM was last used Aug 2019 and contains PII (USDA employee performance appraisals).

6) **Rural Business Service Module (RBS)** (Currently Inactive) was used by the Rural Business Service Alternative Agriculture Research to store Business and Cooperative Program Assessment Reviews (BCPAR) documentation. RBS was last used Jan 2011 and contains PII (RBS business credit reports, if sole proprietors).

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?

ECM - collects and maintains the following Personally Identifiable Information (PII) from members of the general public and USDA employees and contractors: Full name, full home address, SSN/TIN, telephone numbers, email addresses, data of birth, financial information, biometric data, criminal history, employment history, agency identification numbers, and handwriting or an image of the signature.

MFIS - collects and maintains PII from program participants: full name, date of birth, full home address, marital status, gender, race, ethnicity, education, financial/banking information, and medical history (disability/health status).

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

ECM

- **AMS, DCFO, MFH Housing Vouchers**, **SO, GRM**, **IPM, MisPay, RBS** – program participants
- **CMM -** General public, program participants, employees
- **ePSF -** Employees, contractors, Office of Personnel Management (OPM), Defense Counterintelligence and Security Agency (DCSA)
- **GUM -** program participants, employees
- **OGC-CMM -** program participants, employees
- **CAM** - General public
- **PAM** - employees

MFIS

Customer Information originates from management agent, Service Bureaus, Borrower Name(s), and Key members, to include General Partner, Managing Partner, Limited Partner, Syndicator, Officer or Other Official. Borrowers can be an individual or corporation. Tenant(s) applying to reside in the units of the project provide their information, as noted on the Tenant Certification Document (Form 3560-8). MFIS obtains loan account information is from Automated Multi-Family Account System (AMAS). Banking information of the tenant is contained in the Pre-Authorized Debit (PAD) system.

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

ECM – for workflow, tracking, document management purposes.

MFIS - Customer Information is collected to record the borrower and management agents associated to a project as well as communicate project information. Tenant information is collected by the borrower or their management agency and transmitted to the Agency to manage properties.

1.4   How is the information collected?

ECM – receives, collects, imports, interprets, documents, and tracks incoming correspondence and content. The public does not have direct access to ECM. All data is received by USDA personnel from the original source as listed in Section 1.2 and then imported into ECM. The system transfers the documents to the ECM database located at DISC.

MFIS – Project information is downloaded from AMAS in a nightly batch run. Tenant information is entered directly into MINC or via Form 3560-8. PAD related information is collected directly online into PAD and sent to Pay.gov via ECMS.

1.5   How will the information be checked for accuracy?

ECM - Users with approved role-based access would be responsible for the accuracy of the data that they upload in ECM.

MFIS - Management Agents validate tenant data prior to approval of project worksheets. Tenant transactions are automatically validated against the last transaction accepted for reasonableness and differences. Servicing offices enter project tracking information and physical inspection data and validate the interaction of these activities via MFIS Reports. Agency specialists perform periodic site reviews of properties and interview the management agent(s) and/or a randomly selected subset of tenants. Agency specialists preload an interview template into their Mobile Application and enter the data onsite. Once back in their Regional Agency office, specialists upload the information into MFIS.

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

- Consumer Credit Protection Act, 15 U.S.C. §1601, et. seq.
- Consolidated Farm and Rural Development Act (7 U.S.C. 1921 et seq)
- 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.)
- Equal Credit Opportunity Act, 15 U.S.C. §1691, et. seq.
- Farm Bill 2018 (P.L. 115-334)
- Fair Credit Reporting Act, 15 U.S.C. §1681f
- Fair Debt Collection Practices Act, 15 U.S.C. §162
- Debt Collection Act of 1982, Pub. L. 97-365 (5 U.S.C. 5514; 31 U.S.C. 3701 et seq.)
- Debt Collection Improvement Act of 1996, Pub. L. 104-134 (5 U.S.C. 5514; 31 U.S.C. 3701 et seq.);
- OMB Circular A-130, Managing Information as a Strategic Resource, July 2016
- Privacy Act of 1974 (5 U.S.C. Sec. 552a)
- Title V of the Housing Act of 1949 as amended (42 U.S.C. 1471 et seq)
- 31 U.S.C. 7701 (Taxpayer Identifying Number)
- 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
- USDA Departmental Regulation (DR) 3080-001

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

MODERATE RISK: The privacy risk is the potential unauthorized disclosure or illegal use of the PII contained in the documents uploaded in ECM and the adverse consequences any unauthorized disclosure or use would have on the RD customer.

MITIGATION: All RD-HVA users to the system will be authenticated through eAuthentication.

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.

ECM is a document repository. Data is stored in ECM in designated folders. Users with approved access to the designated folders can access the data in ECM and create ad hoc reports, as necessary. The data could be used to respond to inquiries, process invoices and process day to day work. Data received from the DLGB module will be stored in ECM and may also be shared with the Electronic Customer File (ECF) application. Additionally, reports are generated on a frequent basis using Hyperion.

MFIS - Tenant household information including full name, address, and financial information is used to verify eligibility of tenant household for rental assistance, as well as used to build project worksheets that calculates the repayment of the USDA loan based on subsidies given and mortgage payments collected.

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

ECM - Tools are not used to analyze data in ECM.

MFIS - BI-Publisher is a tool used to format reports. Budget Analysis is a set of approximately 40 rules that run the incoming proposed and actual budgets through to check for reasonableness, reject conflicting data and identify typographical errors. The Rental Assistance Obligation Tool (RAOT) is a tool to help distribute yearly Rural Assistance subsidy monies to the projects. RAOT is used to enter data into AMAS

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

Not applicable. RD-HVA does not use commercial or publicly available data.

2.4   <u>Privacy Impact Analysis</u>: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

RD-HVA controls for the system are discussed in detail in the System Security Plan and specifically controls are in place to prevent unauthorized access and to protect privacy.

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?

ECM – records are not scheduled and will remain permanent until a records control schedule is developed/approved.

MFIS - Records Schedule Number DAA-0572-2017-0007, 7 years after cut-off.

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

ECM – No.

MFIS – Yes

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 ECM system stores data indefinitely. With data stored for this length of time, there is the potential of unauthorized access, unauthorized disclosure or illegal use of the customer PII data.

MITIGATION: 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?**

ECM- Information is shared with the system Business Intelligence (BI): Hyperion & Tableau Reporting System application, for the preparation of reports. ECM shares the following PII with BI for the creation of reports: Full name, Address Information, Personal identification number, Biometric data, Criminal History, Employment History, miscellaneous identification numbers and handwriting or an image of the signature are all data elements that could be shared for the purpose of creating reports. The reports would be provided to the designated administrators of the modules. Information from the SO module is also shared with the system Common Call Components (CCC): Electronic Customer File (ECF) application. USDA's Marketing and Regulatory Programs (MRP) sends business entity names, addresses, business owner's full name, owner's contact information, and employees' full names to PAS for reporting purposes.

MFIS does not share with other USDA Mission Areas.

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

ECM application services are only accessible to an internal USDA audience and are not available to the public.

MFIS – 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.**

LOW RISK: - Privacy risks include the potential compromise of PII data with ECM. The risk associated with the sharing of the data is minimal.

MITIGATION: ECM data access is controlled by designated administrators, utilizing eAuthentication to identify and authenticate the users, and audit logs of user activity.

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?

       ECM – N/A, information is not shared externally from USDA.

       MFIS - shares data with New York State Housing Trust Fund Corporation (NYSHTFC). NY State Housing receives the following information from MFIS, via the New York State RD office: full name of tenants, SSN, project name, unit type, unit number, sex, date of birth, race, ethnicity, handicapped, elderly, and student status. The report information, also contained in Form RD 3560-08 for monthly HTFC reporting, includes as and income information for the household, and calculation of the amount of rent subsidy required from the HFTC. HTFC uses this information to provide New York tenants with rental assistance from its program. Though there is no interconnection, the information is placed in a monthly, Single File Transfer Protocol (SFTP) file that is available for pickup by NYSHTFC. The MOU was signed in 2016.

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.

       ECM – N/A

       MFIS - Yes, the sharing of PII in MFIS with external entities is consistent with routine uses of sharing of PII data under SORN USDA/Rural Development-1, Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs, Routine Use #15.

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

       ECM – N/A

       MFIS sends SFTP files daily via HyperText Transfer Protocol Secure (HTTPS) to NYSHTFC by authorized CSC employees. The New York State RD office transmit the Tenant Information data from MFIS as an email attachment to HTFC via WinZip file, using 256-bit encryption and password protection.

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

MODERATE RISK: The risk to external information sharing would be the unauthorized disclosure of lender status and loan closing reports, budget and payment status, statement and tax report information, borrower information and accounting information.

MITIGATION: The New York State RD office transmit the Tenant Information data from MFIS as encrypted (WinZip), password protected email attachment to HTFC, via 256-bit encryption. System and Communication Protection (SC) to prevent unauthorized and unintended information transfer. System and Integrity (SI) controls are in place to provide integrity and confidentiality. The security and control of PII is the responsibility of the System Owner and RD employees.

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.**

ECM – Yes, under SORN RD-2, Enterprise Content Management, http://www.ocio.usda.gov/policy-directives-records-forms/records-management/system-records

MFIS – Yes, under USDA/Rural Development-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?**

ECM - Notice was provided to individuals by the initial source systems prior to collection or processing of the information. ECM is a document repository and is not involved in the initial collection of information from the individuals. ECM is used internally by authorized RD staff since it is not available to the general public.

MFIS - Yes. RD Form 3560-8, Tenant Certification, and RD Form 3560-27, Rental Assistance Agreement, contain a Privacy Act Statement to the individual borrower prior to information collection.

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

ECM - 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. ECM is a document repository and is not involved in the initial collection of information from the individuals. ECM is used internally by authorized RD staff since it is not available to the general public.

MFIS - Yes, notice of opportunity and/or right to decline to provide information was provided to individuals whose information was collected by way of a form, but notice indicates that "failure" to

disclose certain information may delay the processing of eligibility or rejections. RD will not deny eligibility if the individual refuses to disclose their Social Security Number.

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

ECM - Consent of the individuals for uses of the information would have been obtained by the initial source systems, if required, prior to collection or processing of the information. ECM is a document repository and is not involved in the initial collection of information from the individuals.

MFIS - Yes, to apply for rental assistance, the RD applicant consents to the collection of personal information as required for tenant certification and the rental assistance agreement. The RD applicant provides their consent with the use of a Privacy Act Statement found on RD Form 3560-8, Tenant Certification and RD Form 3560-27, Rental Assistance Agreement.

6.5 <u>Privacy Impact Analysis</u>: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

ECM - 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. Individuals do not have direct access to the system as users. Notice of the purposes and uses for the collection of the information is provided in the SORN RD-2.

MFIS - A Privacy Act Statement is provided on Tenant Certification Document (Form 3560-8) for the information collection. Individuals do not have direct access to the system as users. Individuals have the option to decline to proceed. If the individual declines, no data is collected; therefore, no risk is associated. If the individual accepts, they provide their own data and are aware of the information being collected. In addition, notice of the purposes and uses for the collection of the information is provided in the SORN RD-1.

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?

ECM - The public does not have direct access to ECM; all data is received by USDA personnel from the original source and then scanned into ECM by USDA personnel.

MFIS - Requests for the information are presented in writing to CSC or the Servicing Offices. Reports are then generated and returned to the individual requesting the information after verification that the requestor has authority to access that 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?

ECM - The general public does not have direct access to ECM; all data is received by USDA personnel from the initial source systems. Individuals are notified of the procedure to gain access to and contest their information in the Notification Procedure, Record Access Procedures and Contesting Record Procedures sections as outlined in the SORN RD-2.

MFIS - The data is reviewed by area specialists, CSC and Management Agent. If data can be modified via MINC, transactions are sent in to make the modification. Otherwise, changes are made via the online system once official change requests are received by the Area Specialist or CSC. Audit records are stored in the database recording who entered the change into the MFIS application. Notifications are sent back to the requestor or viewed and approved via the project worksheet by the management agent. 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.

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

ECM - The general public does not have direct access to ECM; all data is received by USDA personnel from the original source components. Individuals are notified of the procedure to gain access to and contest their information in the Notification Procedure, Record Access Procedures and Contesting Record Procedures sections as outlined in the SORN RD-2.

MFIS - users contact the CSC Help Desk for questions or contact the area servicing office handling the project. Questions from customers arise when they are using the MINC portal. The MINC portal contains a "contact us" help page listing the contact information for different types of issues. For Pre-Trac users, they contact the Servicing Office processing the Prepayment Request.

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

ECM - 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-2.

MFIS - Contact the CSC Help Desk for questions or contact the area servicing office handling the project. 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.

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

ECM - No additional risks are associated with the redress process. The requestor may also refer to the RD-2 SORN, Enterprise Content Management, for additional information regarding Notification Procedure, Record Access Procedures and Contesting Records Procedures.

MFIS: No additional risks are associated with the redress process. Individuals or management agents contact the CSC Help Desk or servicing office handling the project to request changes to their information. 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?

ECM - Desk Procedures document the process for establishing, activating, and modifying individual users for ECM.

MFIS - System Authorization Access Requests (SAARs) are submitted by management to request access to the application and to establish the RD user's authority in the system.

8.2 Will Department contractors have access to the system?

Yes, RD contractors are required to undergo the same access and authentication procedures that RD federal employees follow.

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 privacy training titled, RD Understanding PII USDA. In addition, all RD employees and contractors are required to complete annual information security and awareness training, which includes privacy training. RD is responsible for ensuring all new employees and contractors have taken the Department Security Awareness Training as developed by USDA. Training must be completed with a passing score prior to access to a USDA RD System.

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

RD -HVA is undergoing a new ATO certification and accreditation process. Expected to be completed by Aug 2023. ECM's ATO is valid through 10/28/25; MFIS ATO is valid through 11/15/25.

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

RD has an Application Auditing and Monitoring Policy in place that defines the following auditable events: server startup and shutdown, loading and unloading of services, installation and removal of software, system alerts and error messages, user logon and logoff attempts (both successful and unsuccessful), granting of elevated privileges (root access success and failure), modifications of privileges and access controls, all root commands (success and failure), and sensitive files accessed, modified and added.

8.6 <u>Privacy Impact Analysis</u>: 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: There is a moderate risk given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system.

MITIGATION: However, RD has regularly collected auditable events, such as the date and time of the event, the component of the information system where the event occurred, type of event, user/subject identity, and the outcome (success or failure) of the event. Audit logs will be reviewed and suspicious activity will be investigated. Suspicious activity includes, but not limited to: modifications or granting of privileges and access controls without proper request submitted, consecutive unsuccessful log-on attempts that result in a user being locked, multiple unsuccessful log-on attempts without lock out by the same User Identification (UserID), modifications or attempted modification of sensitive files without authorization and within the applications repeated attempts to access data outside a user's privilege.

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?

RD-HVA system boundary merged two systems that process PII.

ECM - The purpose of ECM is to provide RD correspondence and document management tracking from receipt to closure. ECM receives and collects documents from the general public, program participants, political officials, and internal employees and contractors. ECM allows USDA to prepare reports and manage business documents, including correspondence, effectively and efficiently.

MFIS - The purpose of MFIS is to assist Servicing Office personnel with monitoring the management of Multi-Family Housing (MFH) rental properties. MFIS supports the Multi-Family Housing direct loan programs which includes 15,900 projects with 23,000 loans. The projects consist of 450,000 units with 265,500 of the units receiving rental assistance.

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

No, the project utilized USDA-approved technologies. These technology choices do not raise privacy concerns.

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, the system owner and ISSPM have reviewed the OMB guidance, but RD-HVA does not employ third party websites or applications.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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?**

Not applicable.

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

Not applicable.

10.7 **Who will have access to PII that becomes available through the agency's use of 3rd party websites and/or applications?**

Not applicable.

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?

Not applicable.

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)?

Not applicable.

10.10   Does the system use web measurement and customization technology?

No.

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?

Not applicable.

10.12   <u>Privacy Impact Analysis</u>: 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.

Not applicable. RD-HVA does not use third party websites and/or applications.

Approval Signature

Signed copy kept on record.