

Privacy Impact Assessment Automated Multi-Family Account System

Policy, E-Government and Fair Information Practices

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Privacy Impact Assessment for the Automated Multi-Family Account System (AMAS)

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Abstract

The Automated Multi-Family Account System (AMAS) is an online transaction entry and inquiry financial and accounting system accessed by over 270 field offices, National Office, Centralized Service Center (CSC) and the National Finance and Accounting Operations Center (NFAOC). It is a loan and grant origination system that provides tracking and servicing capabilities for these MFH loans and grants. This PIA is required for AMAS because it has PII and the PTA determined that a PIA is needed.

Overview

The Automated Multi-Family Account System (AMAS) is an online transaction entry and inquiry financial and accounting system accessed by over 270 field offices, National Office, and the Finance Office of Rural Housing. The National Office is the primary user of AMAS and the Finance Office has overall operational, financial, and accounting responsibility for Rural Development. Approximately one million transactions are processed through the system annually. External users may include Freedom of Information Act (FOIA) requests, General Accounting Office (GAO) requests, Office of Inspector General (OIG) requests, Office of Management and Budget (OMB) requests, and Congressional requests.

AMAS functions include: online appropriation accounting; online inquiry and transaction input; loan making and loan servicing transaction updates; acquired property inventory; daily register, balancing, and program reporting; and fiscal and financial reporting. AMAS is hosted by NITC on the mainframe and has specific internal users, who are authorized to access AMAS.

AMAS processes loan closing and servicing, including calculating and applying rental assistance and cash application, and general ledger and financial reporting. AMAS receives data from Multi-Family Integrated Service (MFIS), Program Loan Accounting System (PLAS), Automated Mail Processing (AMP) and FOCUS, which are internal RD applications.

AMAS uses ACF2 (Access Control Facility) for user authentication and authorization to AMAS, which is hosted on the NITC mainframe. ACF2 was designed to identify and authenticate authorized AMAS users prior to granting the appropriate system access based on the user's pre-defined access level.

Access to the AMAS application requires an Integrated Data Management System (IDMS) user account and password. This is managed in accordance with Desk Procedures and approved by the AMAS system owner.

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?

AMAS collects, uses, disseminates and maintains loan information, which includes the name of the borrower/applicant, date and place of birth, address, SSN, financial data, debt payment information, voucher recipient name, voucher payment borrower name, and monthly voucher amount.

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

RD Servicing Offices input the RD customer information, which is the RD applicant loan and grant information to apply for an AMAS loan or grant.

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

RD collects the information for AMAS loan and grant applications to meet the RD mission/business needs of providing financial opportunities to foster economic development, growth and support to rural areas.

1.4 How is the information collected?

AMAS information is collected from the application forms submitted by the borrower, voucher holder, and voucher landlord

1.5 How will the information be checked for accuracy?

AMAS loan and grant applications are manually reviewed by the authorized RD area specialist to verify the accuracy of the data as part of the standard workflow process. If a RD applicant or RD customer notices any data inaccuracy, then they can reach out to the RD area specialist to get the necessary correction made to the AMAS loan or grant information.

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

Information contained in AMAS falls under the following:

- *Privacy Act of 1974, as Amended (5 USC 552a);*
- *Computer Security Act of 1987, Public Law 100-235, ss 3 (1) and (2), codified at 15 U.S.C. 272, 278 g-3, 278 g-4 and 278 h which establishes minimum security practices for Federal computer systems;*
- *OMB Circular A-130, Management of Federal Information Resources, Appendix III, Security of Federal Automated Information Resources, which establishes a minimum set of controls to be included in Federal automated information security programs; assigns Federal agency responsibilities for the security of automated information; and*

links agency automated information security programs and agency management control systems;

- *Freedom of Information Act, as Amended (5 USC 552), which provides for the disclosure of information maintained by Federal agencies to the public, while allowing limited protections for privacy.*
- *Federal Information Security Modernization Act of 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 USC 1681 a(f)*
- *Consumer Credit Protection Act, 15 USC 1601*
- *Equal Credit Opportunity Act, 15 USC 1691*
- *The Fair Debt Collection Practices Act, Pub. L 111-203, title X, 124, Stat. 2092 (2010)*
- *7 CFR, section 3560, subsections 55 and 154*
- *RD Records Management Policy*
- *NARA Records Retention*

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

The risk is the potential unauthorized disclosure or illegal use of PII in AMAS and the potential adverse consequences this disclosure or use would have on the RD customer.

The AMAS system owner defines access roles to ensure separation of duties, account management and authorized access to data and information in AMAS. These measures help mitigate the risks to privacy data in AMAS. Since AMAS is hosted on the NITC mainframe, it complies with all security and privacy protections required by USDA as a federal agency.

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.

AMAS loan and grant information is used to support the RD mission and business needs of providing financial services to support economic development and support to rural areas. AMAS information is shared with Treasury to meet IRS reporting and comply with financial regulations for federal agencies.

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

AMAS does not use tools. Authorized RD staff manually review information to ensure that RD applicant/customer information and financial transactions are accurate and meet the RD business rules and USDA requirements.

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

Not applicable, AMAS does not use commercial or publicly available 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.

The controls in place to detect unauthorized access to AMAS information or transactions include NITC audit logs/security logs. There are logs for ACF2, which is how the authorized RD staff identify and authenticate to access AMAS on the NITC mainframe.

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?

AMAS stores three years of history data online with the NITC mainframe. The remaining history is kept on archived tapes and are in accordance with NARA, RD Records Management policy and financial compliance regulations.

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

Yes, AMAS follow data retention as provided by the RD Records Management, which is in accordance with NARA.

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



AMAS data retention has the potential risk of unauthorized access, unauthorized disclosure or illegal use of the customer PII data.

AMAS data is protected by the NITC mainframe, which follows USDA federal agency requirements for data protection and is accredited by FedRAMP. AMAS follows the RD Records Management data retention requirements to manage risk associated with data retention.

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?

AMAS information includes loan and grant application information that is shared internally with the following internal RD applications: MFIS, PLAS, AMP and FOCUS, to meet RD mission/business needs of providing loans and grants to RD customers. AMAS uses the electronic funds transfer (EFT) interface between USDA and US Treasury to transfer funds from borrowers through AMAS.

Multi-Family Integrated Service (MFIS) sends nightly downloads of project and borrower information to AMAS.

Program Loan Accounting System (PLAS) is an accounting system providing transaction processing to AMAS.

Automated Mail Processing (AMP) is an interface to automated mail processing equipment to print statements and reports for AMAS.

FOCUS produces reports on the data, including analyzing the data with business intelligence for AMAS.

4.2 How is the information transmitted or disclosed?

RD field offices and NFAOC enter customer information into the accounting system via batch jobs into the AMAS application.

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.

Privacy risks include the potential compromise of PII data with AMAS. This is mitigated by NITC security protections in place for the mainframe, which hosts AMAS. Also authorized users for AMAS use ACF2 to identify and authenticate and NITC has 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?

U.S Department of Treasury provides debtor and debt information for Treasury Offset Program and Cross Servicing processing with the Fiscal Service Treasury Web Application Infrastructure (TWAI).

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.

Yes, USDA/Rural Development 1, Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs covers the routine use of this information with Treasury.

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

There is an ISA between RD and Treasury for the sharing of data with TWAI. RD and Treasury each have security protections in place to protect the data in the RD and Treasury environments and as it is shared with TWAI, including using a VPN, encryption, audit logs and DNSSec. NITC protects the AMAS data, since it hosted on the NITC mainframe.

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

Privacy risks include the potential compromise of PII and sensitive financial information. This is mitigated by the security protections, such as firewalls, DNSSec, encryption of data in transit, VPN, audit logs, and authorized users, who authenticate to access AMAS using ACF2 and other continuous monitoring that RD has from NITC to be compliant with FISMA and other security and privacy protections as required by USDA and Treasury. AMAS data is stored in a secure environment behind the NITC secure mainframe infrastructure.

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, it follows 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-2016-04-28/pdf/2016-09938.pdf>

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

Yes, notice was provided to the individual prior to the collection of information through the use of Form RD 410-9, Statement Required by the Privacy Act, which is provided before a RD applicant applies for an AMAS loan or grant.

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

Individuals have the opportunity and/or right to decline to provide information, but if they decline, then they will not be able to apply for the AMAS loan or grant. With the RD Form 410-9, Statement Required by the Privacy Act, individuals agree to provide the information, so RD applicants are aware of the collection of personal 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?

No, in order to apply for an AMAS loan or grant, the RD applicant consents to the collection of personal information as required for AMAS loan or grant processing. The RD applicant provides their consent as part of the AMAS loan or grant application with RD Form 410-9, Statement Required by the Privacy Act.

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.

RD applicants consent to providing information for the completion of AMAS loan and grant requirements. RD applicants are notified with the privacy form, RD Form 410-9, when they apply for loans or grants and consent to the use of their data before applying for the AMAS loan or grant.

Risks associated with individuals being unaware of the collection are mitigated because RD individual applicants must consent to the use of their data and this notification is included in the privacy form that is completed as part of the process for applying for AMAS loans and grants with RD.

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?

RD applicants have access to their AMAS loan or grant application information from the review and workflow processing by RD staff. The RD staff member will keep the RD applicant informed as to the status of their AMAS grant or loan application.

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

If an RD applicant notices inaccurate information with their AMAS loan or grant application, then they will contact the RD area specialist for correction of any erroneous information. The RD area specialist will facilitate the correction of any inaccurate information for the RD applicant.

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

Notification is part of the application process for AMAS loan and grant applications, so the RD borrower/applicant can contact the RD area specialist to correct any inaccurate information. Also, RD area specialists involved in processing the loan or grant application do manual review and will contact the RD applicant for any information corrections with their AMAS loan or grant application.

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

Individuals have access, redress, and amendment rights under the Privacy Act and the Fair Credit Reporting Act.

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

Privacy risks associated with redress available to individuals are compromise of PII data involved in the redress activity.

This is mitigated by RD staff acting as responsible data stewards of the RD applicant's information and from the network security protections in place for AMAS on the NITC mainframe. Any redress information with AMAS is protected in accordance with RD policy, which follows USDA security and privacy protections as provided by OMB and USDA policy.

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?

AMAS uses ACF2 (Access Control Facility) for user authentication and authorization to AMAS, which is hosted on the NITC mainframe. ACF2 was designed to identify and authenticate authorized AMAS users prior to granting the appropriate system access based on the user's pre-defined access level.

Access to the AMAS application requires an Integrated Data Management System (IDMS) user account and password. This is managed in accordance with Desk Procedures and approved by the AMAS system owner.

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, as discussed in section 8.1.

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 for AMAS.

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

Yes, AMAS has an ATO, which is in CSAM.

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

AMAS 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, Rev. 4. AMAS is hosted on the NITC mainframe at USDA, which is FedRAMP certified and follows USDA security and privacy requirements.

Access to AMAS is controlled through ACF2 authentication for authorized AMAS users, and access to sensitive information is controlled through NITC Profiles/Groups on a need-to-know basis with audit logs of user activity for AMAS. Section 5 of this PIA describes security protections in place for AMAS data.

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?

Since AMAS is used by authorized RD staff using ACF2 and there are group access management controls, the privacy risks are minimal. Potential compromise of privacy data is mitigated by NITC audit event monitoring and USDA network security protections in place to protect RD data for AMAS on the NITC mainframe.

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?

The Automated Multi-Family Account System (AMAS) is an online transaction entry and inquiry financial and accounting system accessed by over 270 field offices, National Office, and the Finance Office of Rural Housing. The National Office is the primary user of AMAS and the Finance Office has overall operational, financial, and accounting responsibility for Rural Development. Approximately one million transactions are processed through the system annually. External users may include Freedom of Information Act (FOIA) requests,



General Accounting Office (GAO) requests, Office of Inspector General (OIG) requests, Office of Management and Budget (OMB) requests, and Congressional requests.

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For all technologies chosen by RD, an Analysis of Alternatives (AoA) is completed to determine which technologies will be selected and ultimately purchased or built.

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

No, the project utilizes Agency approved technologies for AMAS, and these technology choices do not raise privacy concerns. AMAS is hosted on the NITC mainframe at USDA.

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 the ISSPM have reviewed the OMB memorandums.

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

Not applicable, AMAS does not use 3rd party websites or applications.

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

Not applicable, AMAS does not use 3rd party websites or applications.

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, AMAS does not use 3rd party websites or applications.

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, AMAS does not use 3rd party websites or applications.

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

Not applicable, AMAS does not use 3rd party websites or applications.

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, AMAS does not use 3rd party websites or applications.

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, AMAS does not use 3rd party websites or applications.

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)?

No, AMAS does not use 3rd party websites or applications, so this is not applicable.

10.10 Does the system use web measurement and customization technology?

No, AMAS does not use web measurement and customization technology.

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, AMAS does not use web measurement and customization technology.

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.

Not applicable, AMAS does not use 3rd party websites or applications.



Responsible Officials

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