Privacy Impact Assessment
CLP Shared Services 5 of 7 – eForms (eForms)

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Abstract

eForms is a web-based system created to lessen the public paperwork burden. eForms is a combination of applications, which includes Forms, MyForms, and Forms/Admin. The primary purpose of eForms is to provide electronic submission of service requests by the general public for loan or grant applications to the Farm Production and Conservation (FPAC), Agricultural Marketing Service (AMS), and Rural Development (RD). This PIA is required for eForms because it collects, processes and/or stores PII and the PTA determined that a PIA is needed.

Overview

eForms is a web-based system created to lessen the public paperwork burden. This is mandated by the Paperwork Reduction Act and as part of the regulatory reform efforts, to increase their use of electronic means of information collection and, where feasible, to decrease the frequency of reporting by the public by 50%. eForms gives customers, producers, partners, and others access to forms and account information related to USDA programs. After activating their account, customers may complete and submit documents online to local USDA Service Centers or Area Offices.

eForms is accessible by non-Federal entities. Any internet user may access electronic interactive forms in the PDF format available through eForms search engine. Forms from FPAC (FLAAS), AMS (PSAS/GIPSA), or RD (GLS) are made available through this search engine.

Information flows associated with eForms begins with the constituents' need to submit completed forms required by numerous government programs in which they participate into the appropriate service centers. eForms aids this process in various ways. Program participants are able to download, print and deliver the forms through conventional means or through their user level access to the USDA network and the eForms system, can submit completed forms electronically to the application database. The electronic form is in a non-editable state in this phase (New) and is reviewed for processing. During the course of review, if any information is found to be missing/incorrect/outdated, comments are added to the packet and the form is reassigned to an editable state (Returned) for participant correction.

•   Forms - (hosted in the DISC midrange environment) Public Forms Search Site. Allows for the search and retrieval of public burden forms used by FPAC, AMS, and RD.

•   FormsAdmin - (hosted in the DISC midrange environment) Level 2 eAuth protected web application providing FPAC, AMS, and RD Employees processing of electronic service requested submitted through MyForms. In addition, FormsAdmin will be utilized to update and promote new versions of forms to add to production, as the forms need to be updated due to program changes or new requirements.

•   MyForms - (hosted in the DISC midrange environment) Level 2 eAuth protected web application providing electronic service request submission to federal servicing offices.

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?

Users:
USDA employees
Contractors or other entities working on behalf of USDA
The general public
Other – Loan and Grant Applicants
Data Elements:
Name
Date and/or place of birth
Address Information (street or email address)
Personal identification number (SSN/TIN information)
Financial data
Miscellaneous identification numbers
Handwriting or an image of the signature

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

RD applicants provide loan or grant information using the eForms system.

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

Forms, Forms/Admin, and MyForms provide an electronic service to the RD customer. eForms collects loan and grant application information from the RD customer for electronic servicing, in accordance with the Paperwork Reduction Act and the Farm Bill.

1.4 How is the information collected?

eForms collects loan and grant application information from the RD applicant through electronic submission and/or through paper submission directly to an RD office for processing.

1.5 How will the information be checked for accuracy?

Loan and grant applications submitted through eForms are manually reviewed by authorized RD staff to verify the accuracy of the data as part of the standard workflow process. If an RD

applicant or RD customer notices any data inaccuracy, then they can reach out to the RD staff to get the necessary correction made to the loan or grant information.

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

Information contained in eForms falls under the following:

- Privacy Act of 1974, 5 U.S.C. § 552a, as amended
- OMB Circular A-130, Managing Information as a Strategic Resource, July 2016
- E-Government Act of 2002, Public Law (P.L.) 107-347 (44 U.S.C. §3501 note), which includes Federal Information Security Management Act of 2002 (FISMA), 44 U.S.C. §3541, November 2000, as revised to Federal Information Security Modernization Act of 2014 (also known as FISMA), (44 U.S.C. §3551), December 2014
- Freedom of Information Act, 5 U.S.C. § 552, as amended
- 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 of 2018 (P.L. 115-334)
- Fair Credit Reporting Act, 15 U.S.C. §1681f
- Consumer Credit Protection Act, 15 U.S.C. §1601
- Equal Credit Opportunity Act, 15 U.S.C. §1691
- Paperwork Reduction Act, 44 U.S.C. §3501, *et. seq.*
- USDA RD Instruction 2033-A – Records, Management of RD Records
- NARA General Records Schedules, as updated

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

eForms system owners for Forms, Forms/Admin and MyForms define access roles to ensure the separation of duties, account management and authorized access to data and information in their eForms applications. These measures help mitigate the risks to privacy data in Forms, Forms/Admin and MyForms. Also, all the eForms applications have network security protections, including audit logs of the applications from DISC and USDA network security protections.

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.

Information flows associated with eForms begins with the RD applicant's submission of completed loan or grant application forms for the applicable government program to the RD service centers. RD program participants are able to download, print and deliver the forms or use eAuthentication to access the USDA network and submit their application electronically. Completed eForms loan or grant applications are submitted electronically to the application database. The electronic form is in a non-editable state in this phase (New) and is reviewed for processing by RD staff. During the course of the review, if any loan or grant application information is found to be missing/incorrect/outdated, then comments are added to the packet by the RD staff member and the form is re-assigned to an editable state (Returned) for RD applicant correction.

eForms is accessible by the general public and RD staff. It is hosted on the DISC platform at USDA. RD customers have access to apply using the application forms for loans and grants. RD staff process these application forms for RD programs, including FPAC, AMS, and RD. Authorized users, both RD staff and RD applicants access the eForms applications using eAuthentication.

Forms is an application that is accessible to the public, so an RD applicant can apply for a loan or grant with FPAC, AMS, or RD. Forms can only be viewed and printed with eAuthentication. However, for a public user to be able to save the application form, he or she is required to use Level 2 eAuthentication. RD staff process the forms, once they are submitted.

Forms/Admin is an application that allows RD staff to retrieve forms/packages from RD customers, who submit their loan or grant application using eAuthentication. RD staff process electronic forms submitted to Forms/Admin for FPAC, AMS and RD after using Level 2 eAuthentication to access this application. In addition, FormsAdmin will be utilized to update and promote new versions of forms to add to production, as the forms need to be updated due to program changes or new requirements.

MyForms allows the public user to access this application and apply for a loan or grant using eAuthentication for FPAC, AMS, and RD. RD staff process the applications submitted to MyForms from the RD applicant. eAuthentication is used by RD applicants and RD staff to access MyForms.

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

eForms does not use tools to analyze the data. RD staff manually analyze the data as part of the standard workflow process for eForms applications (Forms, MyForms and Forms/Admin).

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

Not applicable, the applications included in eForms do 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 information or applications in eForms include DISC audit logs/security logs. eAuthentication is used to access the eForms applications and there are audit logs of user activity as well.

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?

All information will be retained in compliance with NARA Guidelines, according to the NARA General Records Schedules (GRS), as well as the RD Records Management policy and financial compliance regulations.

The SORNs RD-1 and RD-2 specify policies and practices for retention and disposal of Rural Development's records.

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

Yes, eForms applications follow data retention as provided by the RD Records Management policy, 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.

RISK: eForms applications data retention has the potential risks of unauthorized access, unauthorized disclosure or illegal use of the RD customer PII data.

MITIGATION: The RD data in eForms applications is protected by the DISC hosting environment, which follows USDA federal agency requirements for data protection and is accredited by FedRAMP. eForms applications follow the RD Records Management data retention requirements to manage risk associated with data retention. There are audit logs for eForms with DISC and eAuthentication audit logs for RD staff and RD applicants/customers.

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?

eForms includes loan and grant application information that is shared internally with FPAC (FLAAS) AMS (PSAS/GIPSA) and RD (Unifi) to meet the RD mission/business needs of providing loans and grants to RD customers and using electronic submission to comply with the Paperwork Reduction Act.

4.2 How is the information transmitted or disclosed?

RD applicants/customers and RD staff use eAuthentication to access Forms, MyForms and Forms/Admin. eForms information is either entered by the RD customer into the eForms application directly or the form is printed and provided to the RD office where the RD customer is applying for a loan or grant. This information is initially processed by the RD field office and is then sent on to the RD agency, or other USDA agency, such as FPAC or AMS. Some RD applicants do not have easy access to eForms electronically, so it also provides the ability to print a hard copy, which the RD applicant can provide to a RD office for processing.

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.

The privacy risk to internal information sharing would be the unauthorized disclosure of loan and grant information, including PII and financial data.

DISC provides protection to the eForms applications data, including PII and sensitive financial data, in transit and at rest, since they are hosted on the DISC hosting platform. eForms applications use of PII data internally is consistent with routine uses of sharing of PII data under SORNs RD-1 or RD-2. DISC follows USDA security and privacy protection requirements and USDA provides network security protections to RD.

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?

 Not applicable, eForms applications do not share information externally.

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.

Not applicable, eForms applications do not share PII outside of USDA.

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

Not applicable, eForms applications do not share information externally. eForms applications are used internally.

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

Not applicable, eForms applications do not share information externally.   eForms applications are used internally.

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 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-2016-04-28/pdf/2016-09938.pdf or RD-2, Enterprise Content Management, 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, 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 a loan or grant with eForms.

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 eForms 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 eForms loan or grant, the RD applicant consents to the collection of personal information as required for eForms loan or grant processing. The RD applicant provides their consent as part of the eForms loan or grant application with RD Form 410-9, Statement Required by the Privacy Act.

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.

RD applicants consent to providing information for the completion of 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 this information is provided.

Risks associated with individuals being unaware of the collection are mitigated because RD individual applicant's 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 eForms 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 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 eForms grant or loan application.

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

If a RD applicant notices inaccurate information with their eForms loan or grant application, then they will contact the RD staff for correction of any erroneous information. The RD staff member 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 eForms loan and grant applications, so the RD borrower/applicant can contact the appropriate RD staff member to correct any inaccurate information. RD applicants are prompted with the eForms application, itself, to correct errors as part of the application process. Also, RD staff involved in processing the loan or grant application do manual review and will contact the RD applicant for any information corrections with their 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 the eForms applications from DISC, which hosts eForms and from USDA. Any redress information with eForms applications 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?

Forms – public access, no authentication required.

My Forms – requires eAuthentication, Level 2 access.

Forms/Admin - requires eAuthentication, Level 2 access.

Desk Procedures document the User Access Management (UAM) Team process for establishing, activating, and modifying individual users for eForms applications. The group and account types are defined by System Owners for the eForms applications. The 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.

RD employees and RD contractors access eForms applications after being provisioned in eAuthentication by a UAM, created by the System POC and completed by the UAM Team (UAMT).

Steps to provision RD employees and RD contractors follow desk procedures as set by the system owner for eForms applications

8.2   Will Department contractors have access to the system?

Yes, only authorized RD contractors with a need to know will have access to eForms applications as part of their regular assigned duties. They follow the same access and authentication procedures that USDA federal employees follow to access eForms (MyForms, Forms and Forms/Admin) as described 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 Forms, MyForms and Forms/Admin

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

Yes, eForms has an ATO, dated 1/27/2020, which is stored in CSAM.

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

eForms 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.   eForms applications, Forms, MyForms and Forms/Admin, are hosted on the DISC platform at USDA, which is FedRAMP certified and uses USDA network security protections.

Access to Forms, MyForms and Forms/Admin is controlled through Level 2 eAuthentication, and access to sensitive information is controlled through DISC.

Profiles/Groups on a need-to-know basis with audit logs of user activity for eForms applications. The User Access Management Team has standard desktop procedures and a roles matrix defining the level of access and how to provision this access to the users for the eForms applications. They audit the list of users and applications that they have access to. User Access Management verification reports can be used to verify these groups are assigned appropriately and account management controls are in place.

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 eForms is used by authorized RD staff and RD applicants using eAuthentication and there are group access management controls, the privacy risks are minimal. Potential compromise of privacy data is mitigated by DISC audit event monitoring and USDA network security protections in place to protect RD data for eForms (Forms, MyForms and Forms/Admin). Additionally, eForms applications are accessed using eAuthentication by RD staff and RD applicants through the USDA network.

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?

 eForms applications are accessible by RD applicants and RD staff using eAuthentication to access Forms, MyForms and Forms/Admin. It is hosted on the DISC platform at USDA. RD applicants/customers have access to the loan and grant application forms for eForms applications (Forms, MyForms and Forms/Admin). RD staff process these loan and grant application forms for RD programs, including FSA, NRCS, AMS, and RD.

Forms is an application that is accessible to the public, so a RD applicant can apply for a loan or grant with FPAC, AMS, or RD. Forms can only be viewed and printed without eAuthentication. However, for a public user to be able to save the loan or grant application form, he or she is required to use Level 2 eAuthentication. RD staff process the loan or grant application forms, once they are submitted.

Forms/Admin is an application that allows RD staff to retrieve forms/packages from RD applicants/customers, who submit their loan or grant application. RD staff process electronic forms submitted to Forms/Admin for FPAC, AMS and RD. eAuthentication is used by RD staff and RD applicants/customers to access Forms/Admin.

MyForms allows the RD applicant to access this application and apply for a loan or grant using eAuthentication for FPAC, and RD. RD staff process the applications submitted to MyForms from the RD applicant.

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 MyForms, Forms and Forms/Admin, and 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 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, eForms does not use 3rd party websites and/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, eForms does not use 3rd party websites and/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, eForms does not use 3rd party websites and/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, eForms does not use 3rd party websites and/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, eForms does not use 3rd party websites and/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, eForms does not use 3rd party websites and/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, eForms does not use 3rd party websites and/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)?

Not applicable, eForms does not use 3rd party websites and/or applications.

10.10 Does the system use web measurement and customization technology?

Not applicable, eForms 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?

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

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, eForms does not use 3rd party websites and/or applications.

Agency Responsible Officials

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Agency Approval Signature

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