Privacy Impact Assessment
New Loan Originations (NLO)

Policy, E-Government and Fair Information Practices

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Document Revision and History			
Revision	**Date**	**Author**	**Comments**
1.0	8/1/2016	TGW	FY16 review/rolled up modules into parent PIA
2.0	11/8/2017	SAC	FY18 Annual Review, removed 53A, adjusted inventory list. Added new FOIA Liaison, updated system owners.
3.0	06/01/2020	CC	Updates and revisions.

Abstract

The USDA relies on its information technology systems, including New Loan Originations (NLO) to accomplish its mission of providing cost-effective and reliable services to the USDA, other Federal agencies, and the public at large. New Loan Origination consists of the following modules: Broadband Application Information Log (BAIL), Broadband Search Application (BSA), Commercial Program Application Processing (CPAP), DocFactory, Eligibility/Manager, Grants USDA (GIM), Guaranteed Underwriting System (GUS), National Office Reserve Funds (NORF), RD Apply: Construction Work Plan (CWP) & Electronic Preliminary Engineering Report (ePER), and UniFi.

Overview

New Loan Originations consists of:

- o Broadband Application Information Log (BAIL)
- o Broadband Search Application (BSA)
- o Commercial Program Application Processing (CPAP)
- o DocFactory
- o Eligibility/Eligibility Manager
- o Grants USDA (GIM)
- o Guaranteed Underwriting System (GUS)
- o National Office Reserve Funds (NORF)
- o RD Apply:
    - o Construction Work Plan (CWP) and
    - o Electronic Preliminary Engineering Report (ePER)
- o UniFi

BAIL is a web-based program that allows RD Broadband Division staff members to track loan applications from companies for the construction, improvement, and acquisition of facilities and equipment to provide broadband services to eligible rural communities. These companies send their applications to the broadband staff (via mail, email, courier, etc.), and they enter the data into a SQL database.

BSA is a web application that is part of an applications suite deployed in Broadband Release 2 in 3rd quarter of 2007. It helps public users get information on broadband companies serving different rural communities across the nation and provides a snap-shot of broadband loan status across the country to RD executives and Congress. Release 4 in 4th quarter of 2009 implemented map drawing functions, where users apply for a coverage area within their Broadband loans under three options (Proposed Service Area, Underserved Area, Un-Served Area). It added a second interface called Broadband USA (http://www.broadbandusa.gov) with reduced meta fields (original address http://broadbandsearch.sc.egov.usda.gov) through the American Recovery and Reinvestment Act and the Broadband Data Improvement Act. Both designs produce reference numbers used in the Broadband Collection and Analysis System (BCAS).

CPAP is a tool used by RUS Water and Environmental Protection (WEP) and CF personnel to process WEP and CF loan and grant applications and to set-up and modify projects. The data entered in CPAP includes all data required for completion of forms (pre-application and application) needed to process the obligation of a loan/grant. CPAP also provides capabilities for environmental assessments and impact statements as well as underwriting capabilities that include loan determination and project funding breakdowns. Routine servicing is performed for borrowers, i.e., for annual year-end reviews, security inspections, and compliance reviews. CPAP is also used by RUS Electric and Telecommunication personnel to perform their daily tasks which include keeping their itineraries and tracking activities performed with and for the borrowers. CPAP also maintains borrower details, associated documents for a borrower's account, tracks borrower loans/grants and funds, and provides relevant reports. Since this information is accessible by all Electric and Telecommunication personnel, all personnel are kept updated on the latest actions concerning any Electric and Telecommunication borrowers.

DocFactory is an application which implements an enterprise document assembly solution utilizing the commercial off-the-shelf (COTS) package Exari to implement a system and workflow that aids in the selection and assembly of appropriate documents using data from other systems and/or data retrieved via an interview process. DocFactory\Electric is the first implementation of the document assembly solution.

Eligibility/Eligibility Manager is a non-authenticating application whereby RD Housing Program staff, potential borrowers, and lenders can determine whether a property or prospective property address is inside or outside boundary of areas ineligibility for the Single Family and Multi-Family Housing Programs. Eligibility also provides employees, partners, and public with the capability to determine income eligibility of a potential SFH applicant via the Web and is based on the income limits for Single Family Guaranteed and Direct Housing Programs by county.

GIM is an eAuth Level 2 protected web-based system created to interface with Grants.gov, a Grant Find and Apply web-based system that was one of the Presidential eGovernment Initiatives. GIM accomplishes its goal by providing USDA employees access to information and forms on a 24/7 timeframe to submission of specified Grant forms via the Internet, allowing Grant making agencies to process electronically submitted Grants more efficiently, automating the process of providing interaction through paper format and faxes. Information flows associated with GIM begins with the constituents' need to submit completed Grant Applications required by numerous government programs in which they participate in to the appropriate organization. GIM aids this process in various ways. Program participants are able to download, print and deliver the Grant Applications through Grants.gov via conventional means or through their user level access to the Health and Human Services (HHS) network and the Grants.gov system, can submit completed Grants electronically to the application database. The GIM retrieves the Grants.gov submissions and notifies corresponding agency personnel by email via that Grants are in the 'New' phase and are available on the application database for review. The electronic Grant Application is in a non-editable state in this phase (New) and is reviewed for processing. During the course of the review, if any information is found to be missing/incorrect/outdated, comments are added to the packet and the Grant Application is reassigned to a non-editable state (Not Accepted) for participant correction.

GUS is a Java J2EE application provides a streamlined and automated application process, automated credit decision-making, and automated the eligibility determination for the SFH guaranteed rural housing loan program. It utilizes credit agency interfaces in conjunction with a third-party underwriting engine to automate the credit decision process, and includes loan origination, income and property eligibility determination, underwriting (including risk determination and automated underwriting decisions), Fannie Mae credit reporting, HUD Total Scorecard, and recommendations for loan approval. It interfaces with Income and Property Eligibility (Eligibility), Rules Engine (Rules), GLS, HUD, Fannie Mae and SAVE, and has a web interface to capture borrower loan application data for USDA-guaranteed single-family home loans. It utilizes credit agency interfaces in conjunction with a third-party underwriting engine to automate the credit decision process, and is available for Lenders to enter applications seven days a week via eAuth.

NORF includes the NORF Web Application which includes web pages for the State Offices to input requests for funds reserves from the National Office. The application also includes web pages for the State Offices to view the status of requests for funding, and pages for the National Office staff to view or process these requests.

RD Apply provides applicants interested in receiving financial assistance from RD the capability to submit an application online and receive a lending decision in less time than the processing applications manually.

RD Apply was developed for the Rural Utilities Service (RUS) to accept Electric (Distribution), Telecom (Farm Bill and Infrastructure) and Water and Environmental Programs (WEP) loan requests. Public customers utilize the system to input organization or individual data, project proposals, funding requests, and other relevant information pertinent to their loan/grant application. RD Staff access RD Apply to validate that the application is complete and to assist public customers with questions.

The target user community and primary beneficiaries of this project are as follows:

1. Entities and individuals submitting applications for financial assistance from RD.

2. National office, state office, and field office staff.

3. Other stakeholders including, but not limited to consultants, trade associations and other federal programs.

RD Apply security and roles are managed with a combination of interfaces between RD Apply, eAuth, and Application Authorization System Module (AASM). The system populates existing customer data from CPAP and CLSS. RD Apply has a built-in mapping module that allows users to draw service areas, and exchange information with the Geospatial Datacenter (GDW). The System stores customer uploaded attachments and certifications in the Electronic Customer File (ECF). Once an application has met all data quality checks and passed validations for completeness, the discreet application data is formatted into document forms and sent to ECF.

RD Apply interfaces with the Tabular Data Warehouse (TDW) for reporting purposes sending transactional data on a nightly basis. The system also interfaces with two legacy processing systems (Broadband Application Information Logging System (BAIL) and Commercial Programs Application Processing (CPAP) where the program staff can select customer

submitted applications to be sent downstream. Borrowers and RD Staff have access to applications in the system both in process as well as after submission.

Construction Work Plan (CWP) provides applicants interested in receiving financial assistance from Rural Development (RD) the capability to submit a CWP online and receive an approval decision in less time than the processing work plans manually.

The target user community and primary beneficiaries of this project are as follows:

1. Entities and individuals submitting applications for financial assistance from RD.

2. National office, state office, and field office staff.

3. Other stakeholders including, but not limited to consultants, trade associations and other federal programs.

CWP captures CWP data electronically to be used in review to improve review and outreach.

CWP security and roles are managed with a combination of interfaces between RD Apply, eAuth, and Application Authorization System Module (AASM). The system populates existing customer data from CPAP and CLSS. The System stores customer uploaded attachments in Electronic Customer File (ECF). Once a CWP has met all data quality checks and passed validations for completeness, the discreet data is formatted and can be imported into RD Apply.

Borrowers and RD Staff have access to CWP in the system both in process as well as after approval.

Electronic Preliminary Engineering Report (ePER) provides engineers hired by potential applicants interested in receiving financial assistance from RD the ability to generate a preliminary engineering report to fulfill the federal requirements of the 1780-2 bulletin. This is specific to Water & Waste Loans Applications.

UniFi is a loan origination application is a COTs product, which has been significantly enhanced to accommodate the unique requirements of the single family housing direct loan programs. UniFi is the tool used by the USDA Service Centers for all phases of rural housing direct loan and grant origination, from prequalification to loan approval to loan closing. Borrower application information entered into UniFi is uploaded to LoanServ where the National Financial and Accounting Operations Center uses the LoanServ application to provide loan servicing and support for all rural housing direct loans and grants, including delinquency servicing and risk management.

Only the following systems require a PIA and will be evaluated in this document: CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER and UniFi.

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?

CPAP:
- USDA Employees
- General Public
- Business Names
- Mailing Addresses
- Business Phone Numbers
- Email Addresses
- Name
- Address Information
- Personal Identification Number
- Financial Data
- SSN/TIN

DocFactory:
- USDA Employees
- USDA Partners
- Name
- Address Information
- Personal Identification Number
- Financial Data
- SSN/TIN

Eligibility/Manager:
- General Public

GIM:
- General Public
- Name
- Address Information
- Personal Identification Number
- Miscellaneous Identification Numbers
- SSN/TIN

GUS:
- General Public
- Lending Institutions
- Name
- Date of Birth
- Addresses Information
- Personal Identification Number
- Financial Data
- Employment History
- Miscellaneous Identification Numbers

- SSN/TIN

NORF:
- General Public
- Name
- Miscellaneous Identification Numbers

RD Apply:
- USDA Employees
- Contractor Name
- General Public
- Name
- Address Information
- Personal Identification Number
- Financial Data
- Miscellaneous Identification Numbers
- SSN/TIN

CWP –
- USDA Employees
- Contractor Name
- General Public
- Name
- Address Information
- Personal Identification Number
- Financial Data
- Miscellaneous Identification Numbers
- SSN/TIN

ePER -
- USDA Employees
- Contractor Name
- General Public
- Name
- Address Information
- Personal Identification Number
- Miscellaneous Identification Numbers
- Photographic image/identifying characteristics
- Other information that may be seen as personal
- SSN/TIN

UniFi:
- USDA Employees
- General Public
- Name
- Date of Birth
- Personal Identification Number

- Financial Data
- Miscellaneous Identification Numbers
- SSN/TIN

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

CPAP – NITC, PLAS, TDW, CLSS, Application packet (application, financials, business plans and a feasibly study) data is provided by potential borrowers. Program Staff, Deputy Chief Financial Officer Staff, General Field Representatives, and Field Office users physically enter application and other data directly into the CPAP. Data is also provided and uploaded to the CPAP via files and stored procedures which transfer/update data to and/or from interface sources. Processing copies of the application packet data are/could be maintained on the USDA-RD intranet SharePoint server in a locked down directory to ensure that no unauthorized use could take place.

GIM – PLAS, Personal Identifiable information is being collected electronically to remove the need for citizens to mail or fax grants information.

GUS – GLS, FSA loan officers, trusted lenders and monthly banking data files from Treasury via National Information Technology Center (NITC).

RD Apply – User supplied information

- BAIL
- BDMS
- CPAP
- ECF

UniFi - LoanServ, eForms, Applicants/Customers, Credit Reports, Employment Verification Reports, USDA Employees, and Vendors.

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

RD Apply: CWP, ePER - The information being collected, used, and disseminated, or maintained is required through existing agency regulation regarding the act of requesting Federal Credit Subsidy and subsequent monitoring and reporting of Credit Subsidy requests.

CPAP - Data is being collected to make available an automated means to provide a complete program management and financial information system for Rural Development direct loan and grant programs. Data will facilitate the processing by USDA personnel of applications, obligations, loans, and grants, on behalf of Rural Development customers. Data is also used for required reporting purposes to entities such as, U.S. Treasury, etc.

DocFactory - This data is required in most states for filing purposes and is also necessary in order to keep track of the borrower's corporate standing.

GIM - The information is collected to provide an electronic service for the customer.

GUS - Information is collected to monitor USDA-guaranteed private sector lender's loan portfolios and to provide financial information on the CLP Originations, New Loan Originations portfolio. The data is also used to determine eligibility and for consolidated reporting purposes such as demographic data.

NORF - The National Office makes a recommendation on the request, approves the request, or denies the request. National Office can also modify, delete, or add new fund sources.

UniFi - Data is used to process loan origination activities, including prequalification, application processing, underwriting, and loan closing.

1.4   How is the information collected?

CPAP - Application packet (application, financials, business plans and a feasibly study) data is provided by potential borrowers. Program Staff, Deputy Chief Financial Officer Staff, General Field Representatives, and Field Office users physically enter application and other data directly into the system. Processing copies of the application packet data are/ could be maintained on the USDA-RD intranet SharePoint server in a locked down directory to ensure that no unauthorized use could take place. Data is also collected from interface sources which are uploaded to CPAP via files and stored procedures.

RD Apply: CWP, ePER - Information is collected through a combination of structured system data loads and user supplied data collected through secure web pages.

DocFactory – Entered electronically by loan applicant.

GIM - The data represents an electronic service delivery channel that supplements existing business processes employed by USDA Grant making programs. Government staff review data submitted through this delivery channel for accuracy and completeness prior to accepting it for further processing. It removes the need for citizens to mail or fax available electronic interactions to these Grant making programs. Personal Identifiable information is being collected.

GUS - RD and FSA loan officers and trusted lenders provide input for guaranteed loan application data. RD receives a monthly file of banking data from Treasury via NITC.

NORF - Information is directly input into the system by National and State Officer Personnel.

UniFi - Through daily system updates, exception reports, and daily audit reports.

1.5   How will the information be checked for accuracy?

CPAP - The data will be verified through system screen edits and validations. Program Staff, Field Offices, and Finance Office Staff will periodically query the data in the system through standard reports (i.e., Data Warehouse, discrepancy, and daily obligation reports) to audit the system operation and input of data.

During development and testing phases of system enhancements and new functionality, business users/program staff will verify the newly developed and test results data.

Data integrity controls are used to protect data from accidental or malicious alteration or destruction and to provide assurance to the user that the information meets expectations about its quality and that it has not been altered. Validation controls refer to tests and evaluations used to determine compliance with security specifications and requirements.

The system maintains audit log information by user identifications (IDs). Users are USDA employees and the system logs changes made in the system by their ID for auditing and control purposes.

RD Apply: CWP & ePER - Information will be checked for accuracy through a combination of real time data validation and inspection of operational reports by authorized government personnel.

DocFactory - This is a business TIN, not an individual's SSN. UCC-1 form stands for Uniform Commercial Code – 1.

GIM - Manual inspection of Grant Application information by authorized USDA employees is leveraged to verify accuracy of that data set. Other system data sources are viewed as authoritative sources and maintain a separate verification process for the data they provide.

GUS - The risk of loss, misuse, or unauthorized access to this information is low since the information is transferred to paper forms which are printed and signed by the customer. Once the data is on hardcopy, the application data stored in the system is not involved in the loan process. There are many balancing processes that execute with every batch update cycle to validate the data. Reports are for both New Loan Originations operational tables and data warehouse tables. Balancing is done against general ledger, allotment summary, and check disbursement. The Deputy Chief Financial Officer (DCFO) reviews these outputs daily.

NORF - Application software contains internal edits to ensure data integrity.

UniFi – Application software contains internal edits to ensure data integrity, and data is reviewed by area specialists.

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

Customer and employee information is protected by the following legal authorities:

- 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.
- The E-Government Act of 2002, 44 U.S.C. 3531 et seq.
- House Resolution 6124, also known as the Food, Conservation, and Energy Act of 2008 (Farm Bill).
- 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).

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.

RISK: Data collected facilitates the processing by USDA personnel of applications, obligations, loans, and grants, on behalf of Rural Development customers. Collected data is used to monitor USDA-guaranteed private sector lender's loan portfolios, process loan origination activities, including prequalification, application processing, underwriting, loan closing and borrower's corporate standing. The risk is in the potential unauthorized disclosure or illegal use of this PII and the potential adverse consequences this disclosure or use would have on the client.

MITIGATION: Data is stored in a secure environment behind the NITC secure mainframe infrastructure. See the System Security Plan (SSP) security controls Accountability, Audit and Risk Management (AR), Data Quality and Integrity (DI) and Data Minimization and Retention (DM).

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.

CPAP - The principal purpose of the data being collected is to make available an automated means to provide a complete program management and financial information system for Rural Development's Commercial direct loan and grant programs. Data will also be used to meet Federal reporting requirements; e.g., Federal Funding Accountability and Transparency Act (FFATA) reporting requirements; and data is used to provide supporting documentation for determining level of risk of funds and repayment capability of borrowers (customers).

RD Apply: CWP & ePER - Customer information is used in the process of applying for RD credit subsidy to assess initial eligibility and regulatory compliance regarding credit subsidy requests.

DocFactory – The data to be processed by this application will be loan application documentation, along with all related legal requirements.

GIM - To provide a single point of integration between USDA and Grants.gov for receiving and routing all Grant Applications submitted through the Grants.gov Apply service.

GUS - Information is collected to monitor USDA-New Loan Originations private sector lender's loan portfolios and to provide financial information on the New Loan Originations portfolio. The data is also used to determine eligibility and for consolidated reporting purposes such as demographic data.

NORF - National and State Office Personnel input, review and approve information into the system.

UniFi - To provide loan servicing and support for all rural housing direct loans and grants, including delinquency servicing and risk management.

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

CPAP – an application used as a tool to analyze data for portfolio analysis and management. Hyperion reporting tools are utilized to produce various reports for monitoring and auditing the system operation and input of data.

RD Apply: CWP & ePER - The data consumed, processed, and provided is analyzed by Subject Matter Experts (SMEs).

DocFactory - Loan application forms are produced for electric utility companies.

GIM - Manual inspection by RD government staff is used to analyze the data. No data is produced.

GUS – None.

NORF, UniFi - Application software contains internal edits to ensure data integrity.

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

CPAP, CWP, DocFactory, GIM, GUS, NORF, – N/A.

RD Apply: ePER, - The system uses Geographic Information System (GIS) base services providing US Census Track information as part of the loan application process.

UniFi - Collects information from such sources as Equifax, Employers, Taxing Authorities, Insurance Companies, and other vendors in order to make credit underwriting decisions.

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.

Access is controlled by User ID and password. Access rights are granted to designated individuals only when a written request is approved by their supervisor, the site system manager, and the ISSPM.

Users must have a Level II eAuth ID and are uniquely identified with a user ID. The system maintains the identity of the user and links allowable actions to specific users.

Privileges granted are based on job functions and area of authority (e.g. State Office user with authority for their state only).

Authority to see any privacy data within the system is restricted to those users with National Office approval. This is a special authority added to a logon ID. Logon ID set up goes through UAMT.

The National Institute of Standards and Technology (NIST) 800-53 rev 4 controls for the CLSS system are discussed in detail in the System Security Plan and specifically the Access Controls (AC 1-6, 11, 12, 14, 17, 20, and 21), Identification and Authentication (IA 1-8) controls are in place to prevent unauthorized access restricting users from accessing the operating system, other applications or other system resources not needed in the performance of their duties and is restricted by eAuthentication (eAuth). The Authority and Purpose (AP 1-2) compensating controls give explanation of why PII is allowed on the system. Systems and Communication Protection (SC 1, 2, 4, 5, 7, 8, 10, 12, 13, 17, 20-23, 28, and 39) controls are in place to prevent unauthorized access.

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?

CPAP, DocFactory, GUS, RD Apply: CWP & ePER – Information is retained indefinitely.

GIM - Information is only retained for the length of time to perform a process.

NORF, UniFi - All information will be retained in compliance with NARA Guidelines, according to the NARA General Records Schedules (GRS). The ITS web farm backs up data daily to tape. Tape backups of all data are stored for 15 years.

The SORN RD-1 specifies 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)?

System of Record (SOR) was completed and submitted to NARA in accordance with Section 207(e) of the E-Government Act of 2002 [44 U.S.C. 3601] and NARA Bulletins 2008-03,

Scheduling Existing Electronic Records, and 2006-02, NARA Guidance for Implementing Section 207(e) of the E-Government Act of 2002.

GIM - There is not data retention beyond the time it takes to process the information.

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: Information being retained for an indefinite length can potentially be a risk. (CPAP, DocFactory, GUS, RD Apply: CWP & ePER). 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.

GIM - Minimal risk associated, since there is not data retention beyond the time it takes to process the information.

NORF, UniFi – Moderate risk associated. At the end of the retention period, data is properly destroyed by overwriting the entire media, degaussing, and disk formatting are used, but strict attention is paid to whatever process is selected to ensure that all unneeded data is completely destroyed. Papers and other soft materials, such as microfiche and floppy disks, are shredded.

MITIGATION: Data Integrity controls (DI 1-2) are used to protect data from accidental or malicious alteration and destruction providing assurance to the user the information meets expectations for quality and it has not been altered. Validation controls refer to tests and evaluations used to determine compliance with security specifications and requirements are in place. Methods such as overwriting the entire media, degausses, and disk formatting are used, but strict attention is paid to whatever process is selected to ensure that all unneeded data is completely destroyed. Papers and other soft materials, such as microfiche and CD's, are shredded. Also, the data is stored in a secure environment behind the NITC secure mainframe infrastructure. See the System Security Plan (SSP) security controls Accountability, Audit and Risk Management (AR), Data Quality and Integrity (DI) and Data Minimization and Retention (DM).

All information will be retained in compliance with NARA Guidelines, according to the NARA General Records Schedules (GRS).

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?

Commercial Loan Servicing System (CLSS) – CPAP transmits data needed to process obligations / de-obligations into PLAS during the nightly update.

GLS – GUS sends data for GLS to process Lender Status Reports and Loan Closings.

Shared Services (BI/TDW) – CPAP, GUS and RD Apply send reporting information to TDW.

Common Call Component/ECF – RD Apply, GUS and ePER provide data to ECF/Imaging for HUD total scorecard and loan approval recommendations.

eForms – UniFi provides data to populate forms that forwards data to agencies.

4.2   How is the information transmitted or disclosed?

CPAP - Data is transmitted via files/automated stored procedures.

DocFactory, GIM, NORF – N/A

GUS - The information is transmitted using HTTPS.

RD Apply: CWP & ePER - Once the information is transmitted using HTTPS to Electronic Customer File (ECF)/Imaging it is processed in association with the application being submitted via RD Apply.

UniFi – Information is transmitted to eForms via Network.

4.3   <u>Privacy Impact Analysis</u>: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

RISK: The risk to internal information sharing would be the unauthorized disclosure of lender status and loan closing reports, obligation and disbursement data, statement and tax report information, borrower information and accounting information.

MITIGATION: The NIST 800-53 rev 4 controls are discussed in the SSP. 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. Risk is mitigated with the implementation of RD ISSS NIST policies, standards and procedures. Also, the data is stored in a secure environment behind the NITC secure mainframe infrastructure.

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?

CPAP, DocFactory, NORF, RD Apply: CWP & ePER – N/A.

GIM - Grants.Gov: To deliver grant applicants with a simple, unified system through which applicants can search for funding opportunities, download grant opportunity packages and submit completed applications.

GUS: CAIVRS (HUD): The purpose of this connection is to query CAIVRS to ensure there is no delinquent federal debt. This information is passed back to GUS for analysis and comparison to an internal decision engine to process an underwriting decision.

Fannie Mae: The nature of the information services is a request from Guaranteed for data from Fannie Mae to be passed into the GUS component for analysis. This data is used by the decision engine to rate the borrower application. A request is transmitted via the secure (https) Web Service to Fannie Mae and receive information back on that request.

SAVE: for the purpose of verifying citizenship and immigration status information of non-citizen and naturalized or derived U.S. citizen applicants (applicant) applying for USDA Housing Assistance, USDA Housing Grants, USDA Housing Loans, USDA Loan Guarantees, and USDA Rent Assistance (benefit).

UniFi: Equifax: In order to apply for an RD single family housing direct loan, a tri-merge credit report must be obtained for the applicant(s). An Infile credit report may also be requested for pre-qualifications. A request is sent from the UniFi production server to EMSWS then to the credit bureau server over a secure internet connection using Secure HTTP (HTTPS).

Equifax returns a Tri-Merge/Infile credit report via an Internet API call to the secure web portal over HTTPS. The Tri-Merge/Infile credit report format is in the MISMO 2.3.x XML file data format that contains the applicant's credit history and credit scores, if available.

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, under USDA/RD-1 Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs.

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

CPAP, NORF, RD Apply: CWP & ePer – N/A.

DocFactory - The documents generated through the DocFactory process represent large contracts that are printed and mailed to appropriate parties.

GIM, GUS - Interconnection Service Agreement and Memorandum of Understanding agreements are in place in CSAM and maintained by the ISSS.

UniFi - uses Progress OpenEdge 10.0 database. A file is created and transmitted to the NITC mainframe at regular intervals using WS_FTP Pro v7.5.

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

CPAP, NORF, RD Apply: CWP & ePer – N/A.

RISK: The risk to external information sharing would be the unauthorized disclosure of statement and tax report information, borrower information and accounting information.

MITIGATION: Data is sent via VPN and a signed Interconnection Service Agreement are in place in CSAM and maintained by the ISSS. The NIST 800-53 controls are discussed in the SSP. 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. Risk is mitigated with the implementation of RD ISSS NIST policies, standards and procedures. Also, the 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, under USDA/RD-1 Current or Prospective Producers or Landowners, Applicants, Borrowers, Grantees, Tenants, and Other Participants in RD Programs. https://www.govinfo.gov/content/pkg/FR-2019-05-14/pdf/2019-09874.pdf

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

CPAP, NORF – N/A.

RD Apply: CWP & ePER - provides informational notices to individuals prior to collecting loan application information clearly identifying the purpose of the information collection and legal nature of the information collection. This is done in accordance with current USDA OGC guidance to support non-repudiation and electronic signatures.

DocFactory - Yes, notice is provided to individual that their information is being collected. The intended routine use of the data being collected is an automated means to provide complete program management and financial information.

GIM - Yes, Review and disposition determination of electronic grants submitted through Grants.gov.

GUS – Yes.

UniFi - Yes, at the time of loan application, Form RD 410-4 contains the privacy act notice.

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

CPAP, NORF – N/A.

DocFactory, GUS, RD Apply: CWP & ePer, UniFi – Yes.

GIM - Individuals willingly participate in the application. Review and disposition determination of electronic grants submitted through Grants.gov.

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

CPAP, NORF – N/A.

RD Apply: CWP & ePER - No. The information required and how it will be used is documented in agency regulations.

DocFactory - All information collections require regulatory approval. The program regulations describe allowed usage.

GIM - Authorization to collect and use any data begins with the Regulatory authorization to do so. It is reviewed by parts of OMB when agencies are clearing information collections and disseminations.

GUS – Yes, Users have agreements to consent to the use of his/her data.

UniFi – No, RD Form 410-4 indicates all possible uses of the information.

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.

CPAP, NORF – N/A.

RD Apply: CWP & ePER - Notice is provided to applicants at the time of their application submission. It is during this process that the applicant has the opportunity to cancel the request.

DocFactory - it is an automated means to provide a complete program management and financial information system. There is no subjectivity or decision making based on an individual customer or employee by the system.

Notice is provided to the individual through the eAuth warning banner and the individual does have the option to decline to proceed. If the user declines no data is collected so there is no risk

associated. If the user accepts, then they enter their own data so they are aware of what is being collected.

GIM - Individuals willingly participate in providing information for the completion of loan and grant requirements. Users complete privacy forms when they apply for loans or grants and consent to the use of their data before this information is provided.

GUS – Users have agreements to consent to the use of their data.

UniFi - RD Form 410-4 is provided at the time of loan/grant application. If an individual doesn't sign the application, it will result in the rejection of the loan/grant application. Applicants are aware of the collection of personal information.

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?

CPAP, NORF – N/A.

RD Apply: CWP & ePER - information is open for edit to applicants up and until the point at which they submit the application to Rural Development. After submission, applicants would have to follow exiting agency procedures to request changes.

DocFactory, GIM - The controls in place to identify users and system personnel within CLP Originations are documented in the CLP Originations Systems Security Plan.

Access is controlled by User ID and password. Access rights are granted to designated individuals only when a written request is approved by their supervisor, the site system manager, and the ISSPM. Privileges granted are based on job functions and area of authority (e.g. State Office user with authority for their state only).

GUS - USDA RD and FSA system users and managers, systems administrators, and trusted lenders have access to the information.

UniFi - Individuals should be instructed to call customer service (800-414-1226) to verify information on their account, they can also apply for an eAuth account and Mortgage Account Information Access which will allow them to view their account on the web.

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

CPAP, NORF – N/A.

RD Apply: CWP & ePER - Information is available for review and change by applicants up and until they submit the application for processing. Current procedures for correcting

inaccurate or erroneous information are in place and would be leveraged after application submission. These processes are currently understood and used by applicants.

DocFactory – customer will need to manually correct the information.

GIM, GUS - Access is controlled by User ID and password. Access rights are granted to designated individuals only when their supervisor or the site system manager approves a written request. Privileges granted are based on job functions and area of authority (e.g. State office user with authority for their state only).

Customers and employees may contact **USDA Rural Development Primary FOIA Contact Information**:

Lolita Barnes
FOIA Liaison
1400 Independence Ave., SW
Washington, DC 20250
Tel. 202-692-0004
Email: lolita.barnes@usda.gov

UniFi - Individuals should be instructed to call customer service (800-414-1226) to have changes made regarding incorrect information.

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

CPAP, NORF – N/A.

RD Apply: CWP & ePER - The agency regulations provide applicants notification of procedures to correct information.

DocFactory – customer is contacted via phone or e-mail.

GIM - Information is disseminated through annual POC training and users of PAD have the ability to update their information which is disseminated when they sign their consent form to use the service.

GUS – Information is disseminated through annual POC training.

UniFi - Field Office personnel will give the borrower the customer service number to call. The monthly billing statement also provides procedures for correcting their information.

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

CPAP, DocFactory, ePER, NORF, UniFi – N/A.

RD Apply: CWP - All formal and alternative processes for redress are part of existing agency regulation. The agency regulations provide applicants notification of procedures to correct information.

GIM, GUS - Individuals have access, redress, and amendment rights under the Privacy Act and the Freedom of Information Act.

Contact:

Administrator, Rural Housing Service, USDA, 1400 Independence Avenue, SW, Room 5014, South Building, Stop 0701, Washington, DC 20250-0701;

Administrator, Rural Business-Cooperative Service, USDA, 1400 Independence Avenue, SW, Room 5045, South Building, Stop 3201, Washington, DC 20250-3201;

Administrator, Rural Utilities Service, USDA, 1400 Independence Avenue, SW, Room 4501, South Building, Stop 1510, Washington, DC 2050-1510

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

There would be no additional risk associated with the redress process available to users.

UniFi - Notification to the borrower that a telephone call may be recorded is provided at the onset of the call, notes are entered into the borrower account, and all employees are required to complete annual Information Security and Awareness training. The system uses before and after logging and audit logs to automatically record transactions to borrowers' accounts.

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?

Generally, the National Institute of Standards and Technology (NIST) 800-53 controls for the CLP Originations, New Loan Originations system are discussed in detail in the System Security Plan and specifically the Access Control (AC), Identification and Authentication (IA) and Systems and Communication Protection (SC) controls are in place to prevent unauthorized access. Access control is also addressed in the individual systems desk procedures.

Desk Procedures document the process for establishing, activating, and modifying IDs. This process is defined by System Owners. System Owners define Groups and account types. System Point of Contact assigns group membership and determines Need-to-know validation. The POC is responsible for verifying user identification; the User Access Management Team (UAMT) relies on a POC supplying the correct User ID and password to UAM to identify themselves. UAM tickets are the tool used to track authorized requests by approving Point of Contact (POC).

Currently RD reviews reports from HR on a Bi-weekly basis. The organization employs automated mechanisms to support the management of information system accounts. Temporary

and emergency accounts are not used or authorized. Guest and Anonymous accounts are not managed by ISS UAM Team. POCs (empowered by RD IT managers) are responsible for notifying UAMT if access or roles need to be modified and periodically reviewing and certifying established access.

CWP and RD Apply –

Loan Applicants **-** requires USDA eAuthentication Level 2 assurance.

Internal USDA RD Employees or Affiliates **-** SAAR requests are submitted by Servicing Offices request access to the application and to establish the User's authority in the system. SAAR requests are entered by UAMT. Appropriate users lists are on file.

DocFactory - Privileges granted are based on job functions and area of authority (e.g. State Office user with authority for their state only).

The applications capability to establish access control lists or registers is based upon the basic security setup of the operating system.

Application users are restricted from accessing the operating system, other applications, or other system resources not needed in the performance of their duties via access given to User IDs limited to what is needed to perform their job.

The controls used to detect unauthorized transaction attempts are security logs/audit trails.

Users are required to have password-protected screensavers on their PC's to prevent unauthorized access.

Warning banners are used to warn and inform users who sig0n on to the system that this is a secure and private network. Warning banners are in compliance with USDA guidelines.

ePER -

Engineers **-** ePER requires eAuthentication (eAuth) Level 2 assurance.

Internal USDA RD Employees or Affiliates - In future phases of the application, SAAR requests will be submitted by Servicing Offices request access to the application and to establish the User's authority in the system. SAAR requests are entered by UAMT. Appropriate users lists are on file.

8.2   Will Department contractors have access to the system?

CPAP, DocFactory, GIM, GUS, NORF, UniFi - Yes, Department contractors are required to undergo the same access and authentication procedures that federal employees must adhere to, access procedures are discussed in section 8.1.

RD Apply: CWP & ePER - uses Role Based Access Control. All internal USDA access is managed through the USDA Enterprise Entitlement Management System (EEMS). The standard RD ISSPM SAAR process will be followed for requesting internal access.

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

The NIST 800-53 rev 4 controls for the CLP Originations, New Loan Originations system are discussed in detail in the System Security Plan and specifically the Awareness and Training (AT) controls are in place to provide privacy training. USDA RD requires annual Information Security Awareness Training (ISAT) for all employees and contractors. RD is responsible for ensuring all new employees and contractors have taken the Department Security Awareness Training developed by OCIO-CS. Training must be completed with a passing score prior to access to a USDA RD system. All RD employees/contractors are required to complete ISAT and USDA Privacy Basics on an annual basis.

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

Current ATO is valid until 13 April 2020. Undergoing certification and accreditation currently.

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

The NIST 800-53 rev 4 controls for the New Loan Originations system are discussed in detail in the System Security Plan and specifically the Audit and Accountability (AU) controls 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. These controls, including full compliance, inheritance and risk acceptance descriptions, are available in Cyber Security Assessment and Management (CSAM).

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?

RISK: There is minimal risk given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system.

MITIGATION: However, RD has the following controls in place - collecting auditable events: 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 by the NITC Security Division every two weeks 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.

Per the General Records Schedule 20 Section 1C, the following items will be deleted/ destroyed when the agency determines they are no longer needed for administrative, legal, audit, or other operational purposes: electronic files and hard copy printouts created to monitor system usage, including, but not limited to, log-in files, password files, audit trail files, system usage files, and cost-back files used to assess charges for system usage.

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?

CPAP - This project is part of the Comprehensive Loan Program Investment which facilitates the processing by USDA personnel of applications, obligations, loans, grants, and collections on behalf of Rural Development Commercial Program customers.

RD Apply: CWP & ePER - A CLP Framework program. The CLP Framework is a collection of open source frameworks and technologies.

Applications are protected by USDA eAuth 2.0 and requires a level 2 assurance plus at least on application Role to be granted access for internal user access.

DocFactory - Exari is a commercial, off-the-shelf (COTS) document assembly tool that will be used to build an enterprise solution (DocFactory) to automate the generation of agency documents.

GUS - The application is accessed through the Internet or block mode screens through the mainframe teleview menu. GLS access utilizes an EAuth process. Users accessing the system must register for an eAuth id and present valid credentials to receive Level 2 access. Daily monitoring is performed on our Lender users. A nightly process changes the lender logon (based on tax id) and all lender employees to a status of inactive if a lender or lender/branch updates to Debarred status. The software is not available to the general public; RD/FSA employees' access CLP Originations through logins using ACF2 IDs verified on the NITC mainframe. There is no dial up capability to access the database and no major changes to the network for the St. Louis Web Farm environment.

NORF - A web application which includes web pages for the State Offices to input requests for funds reserves from the National Office. The application also includes web pages for the State Offices to view the status of requests for funding, and pages for the National Office staff to view or process these requests.

UniFi – a loan origination system used for the Single Family Direct Loans and Grants program in Rural Development. Applicants' credit reports are requested through Equifax from the communication servers using CommServ software, proprietary software of Fiserv. The report is returned to the communication server and parsed to the applicant's record in UniFi.

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

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER, and UniFi do not raise any privacy concerns because of its employed technology.

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, guidance has been reviewed by all parties.

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

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - Proctor Financial Insurance Company provides forced place insurance information. U.S. Bank provides borrower's loan payment information through lock box files. Credit Bureaus provide credit reports and credit scores of potential and current borrowers. First American Real Estate Tax Service provides a file containing borrower real estate tax information as a service for some taxing authorities. U. S. Department of Treasury provides debtor and debt information for Treasury Offset Program and Cross Servicing processing.

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

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - Borrower and co-borrower names, social security numbers, phone numbers, addresses, financial data, repayment information, and tax and hazard insurance information.

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

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - Proctor Financial Insurance Company provides forced place insurance information.

U.S. Bank provides borrower's loan payment information through lock box files. Credit Bureaus provide credit reports and credit scores of potential and current borrowers. Core Logic provides a file containing borrower real estate tax information as a service for some taxing authorities. U. S. Department of Treasury provides debtor and debt information for Treasury Offset Program and Cross Servicing processing.

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?

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - It becomes a part of the borrower loan record and is maintained/secured the same way as all information on the borrower account.

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

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - Loan origination information is kept on the system for the life of the loan. Tape backups of all data are stored for 15 years.

> *If so, is it done automatically?*
>
> UniFi - Yes
>
> *If so, is it done on a recurring basis?*
>
> UniFi - Yes

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

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - USDA Rural Development system users and managers, Rural Development Systems Administrators, developers, analysts, and contractors, ITS System Administrators, developers and contractors.

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?

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - USDA Rural Development system users and managers, Rural Development Systems Administrators, developers, analysts, and contractors, ITS System Administrators, developers and contractors.

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)?

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER – N/A.

UniFi - No

10.10 Does the system use web measurement and customization technology?

New Loan Originations 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?

New Loan Originations 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.

CPAP, DocFactory, GIM, GUS, NORF, RD Apply: CWP & ePER, UniFi – N/A.

Agency Responsible Officials

_____

Angela Cole
Information Systems Security Program Manager (ISSPM)
Rural Development
United States Department of Agriculture

Agency Approval Signature

_____

Michael S. Gardner
System Owner
Rural Development
United States Department of Agriculture