

**Appendix F: OMB 0584-0074
SNAPQCS Privacy Impact Analysis**

Privacy Impact Assessment SNAP-QCS

Policy, E-Government and Fair Information Practices

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**Privacy Impact Assessment for the
Supplemental Nutrition Assistance Program -
Quality Control System
(SNAP-QCS)**

July 1, 2019

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Privacy Impact Assessment
Supplemental Nutrition Assistance Program (SNAP) –
Quality Control System (SNAP-QCS)

Document Review			
System Privacy Officer Name	Signature	Date	Comments (if any)
Jennifer Weatherly	<i>s/Jennifer Weatherly</i>	11/13/14	FY15 Review; POC number update only (editorial)
Michael Short			

Abstract

Supplemental Nutrition Assistance Program - Quality Control System (SNAP-QCS). The SNAP-QCS consists of State agencies performing QC reviews of a statistically valid sample of cases, which are further sub-sampled and reviewed by USDA reviewers, to ensure the validity of state findings. A PIA is being conducted due to the content within SNAP-QCS and the controls protecting that data.

Overview

The Supplemental Nutrition Assistance Program (SNAP) is one of fifteen domestic nutrition assistance programs operated by USDA to provide benefits to low-income families to purchase healthy and nutritious food. The SNAP program is authorized by the Food and Nutrition Act of 2008, hereafter referred to as the “Act”. The Act also mandates that USDA operates a quality control system to monitor State Agency performance to ensure that only those eligible receive program benefits, and that they only receive the correct amount authorized by law. Monitoring program performance is further supported by Improper Payments Information Act of 2002 (IPIA), which is essential to ensuring program integrity and safeguarding the investment of the American taxpayer.

The SNAP is monitored through its quality control (QC) system. The current SNAP QC system, which has been in existence since the 1970s, has been singled out by OMB as the benchmark for compliance with the IPIA. The SNAP QC system consists of State agencies performing QC reviews of a statistically valid sample of cases, which are further sub-sampled and reviewed by USDA reviewers, to ensure the validity of state findings.

The process includes monitoring the State QC sampling and reporting process, performing validation reviews, reporting to and negotiating review results with States, supporting the arbitration process, running regression and reporting the results to USDA.

SNAP-QCS does not collect data from customers. However, with the introduction of the FNS-380 Quality Control Worksheet and the ability to manage digital copies of case file documents, the SNAP-QCS production database now contains personally identifiable information (PII). In addition, SNAP-QCS contains Certification Case Number (CCN) supplied by the Supplemental Nutrition Assistance Program (SNAP) State Agencies. Some State Agencies embed the SSN in their CCNs. CCNs are used by SNAP-QCS as a reference number relating back to the State Agency.

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?

Privacy information is contained in the FNS-380 Quality Control Worksheet and in the various case file documents uploaded to the SNAP-QCS database.

Personal Identification Number – Unique identifiers are used by the States to differentiate unique SNAP benefit cases and QC reviews. SNAP QC case documents may include a copy of the applicant's Social Security Card. SNAP-QCS contains a Certification Case Number (CCN) supplied by the States. For some states, this CCN contains a social security number. SNAP-QCS treats this number as a unique identifier in order to assist in following up with State Agencies on particular records.

Financial Data – Financial information is captured by the State case worker to determine SNAP eligibility and allotment. This information is part of the SNAP QC case review and is analyzed by both State and federal QC reviewers.

Health Data – Medical expenses are part of the SNAP eligibility and allotment calculation process. Related health care information may be included on expense-related documents such as bills or receipts from health care providers and prescription services.

Employment History – Current employment information is necessary to make a proper determination of SNAP eligibility and allotment amount. Generally, this takes the form of a pay stub or W2, which may also contain employer information and dates of employment.

Miscellaneous Identification Number – Other numbers from contributing sources such as bank account numbers, public utility customer numbers, invoice numbers, etc. may be present on various documents used for SNAP eligibility and benefit allotment calculation.

Photographic Image/Identifying Characteristics – Identity verification is an important aspect of the SNAP eligibility process. Copies of applicant driver's licenses are routinely made and included in the case file as proof of identity including age, physical characteristics, and address.

Handwriting or an Image of the Signature – As noted above, a driver's license or other form of government-issued identification, such as a passport, are a key part of SNAP eligibility determination. These forms of identification include original and digitized signatures of the bearer. Signatures may also be found on lease agreements (proof of housing expense) or other legal documents.

Other – Each SNAP case is unique and many different kinds of information and supporting documents may be relevant to benefit determination including household composition, location, any policy waivers in place, age, and education.

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

SNAP State Agencies supply all data. No data is directly collected from the customer or USDA agencies.

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

The USDA is required by the Food and Nutrition Act of 2008 to operate a quality control system.

1.4 How is the information collected?

SNAP State Agencies collect and supply all data.

1.5 How will the information be checked for accuracy?

SNAP-QCS does not have its own mechanism to check for data accuracy. Through the SNAP QC process, the data are evaluated for accuracy by State and Federal SNAP QC reviewers.

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

Authorized by the Food and Nutrition Act of 2008

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

SNAP-QCS does not collect data from customers. SNAP-QCS collects data from State Agencies. Some State Agencies embed the SSN in their CCNs. CCNs are used by SNAP-QCS as a reference number relating back to the State Agency. Privacy information is contained in the FNS-380 Quality Control Worksheet and in the various case file documents uploaded to the SNAP-QCS database. This data is encrypted during transfer and at rest. Only those state and federal employees with eAuth Level 2 credentials and who have been authorized through the FNS-674 process to access SNAP-QCS may use the system and perform work that is directly related to SNAP QCS.

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.

The data are used as part of the SNAP QC review process.

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

All data are held within a Microsoft SQL Server.

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

Not Applicable

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.

e-Authentication (Level 2) is used by authorized users to access the system. Users are assigned roles and constraints within the system that limit their access to data.

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?

Permanent. Transfer a copy of the database in an approved NARA format (ASCII, flat file) immediately after approval of this schedule. Thereafter, transfer a copy of database in accordance with NARA specifications at the end of the calendar year.

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

Yes. Disposition Authority N1-462-09-11.

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

There are no risks associated with the length of time data is retained.

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?

Office of Research and Analysis (ORA) – the information shared is the information provided by the State Agencies for the QC review that was completed. This information is used for data-mining purposes.

4.2 How is the information transmitted or disclosed?

The data is extracted from the SNAP-QCS database and provided to ORA via a password protected CD and is sent on an as-needed basis.

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.

State agencies input the required information into SNAP-QCS and it contains PII data. Access is restricted to authorized users and the data are encrypted at rest and in transit. SNAP-QCS does not share PII data.

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?

State agencies will conduct QC reviews to measure the validity of the SNAP cases at a given time (the review date). Reviews will be conducted on a random sample of active and negative cases. The results of the State QC reviews will be recorded in the SNAP-QCS State System.

- 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. Information is not shared outside the Department. SNAP-QCS is under the FNS-5 SORN.

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

Not applicable. Information is not shared outside the Department.

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

Not applicable. Information is not shared and therefore there is no privacy risks related to external sharing.

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.**

SNAP-QCS is under the FNS-5 SORN.

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

SNAP-QCS does not collect data from customers. SNAP-QCS collects data from State Agencies. SNAP-QCS data are subject to the controls defined by State Agencies and those federal privacy controls applicable to the federal users of SNAP-QCS.

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

Not Applicable

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

Not Applicable

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.

Not Applicable

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?

This would be a State Agency concern. Not Applicable to SNAP-QCS

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

This would be a State Agency concern. Not Applicable to SNAP-QCS

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

This would be a State Agency concern. Not Applicable to SNAP-QCS

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

This would be a State Agency concern. Not Applicable to SNAP-QCS

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

This would be a State Agency concern. Not Applicable to SNAP-QCS

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?

See FNS Security Office for how users gain access to any FNS system. Each user must submit an FNS-674 form signed by their supervisor, the system owner, and FNS security officer before they are allowed access. Access is then granted through a user management process internal to SNAP-QCS where appropriate roles and constraints are assigned.

8.2 Will Department contractors have access to the system?

Contractors will have access to the system as needed.

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

Privacy training is part of the annual security awareness training that all employees and contractors must complete prior to being granted access to any FNS system.

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

All FNS systems must undergo Assessment & Authorization prior to being put into production. The last C&A was completed on 08/23/2018; the ATO is dated 03/28/2020.

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

Users of the system are audited at least annually. FNS-674 forms must be on file and their need to access the system is validated at least annually.

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?

By controlling who has access and ensuring that they are given the least privileges needed to perform their job, FNS ensures that only valid users have access.

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?

SNAP-QCS helps determine error rates of each State's SNAP compliance.

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

No

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 "Guidance for Online Use of Web Measurement and Customization Technology" and M-10-23 "Guidance for Agency Use of Third-Party Websites and Applications"?

Yes

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

Not Applicable. SNAP-QCS 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. SNAP-QCS 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. SNAP-QCS 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. SNAP-QCS 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. SNAP-QCS 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. SNAP-QCS 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. SNAP-QCS 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)?

Not Applicable. SNAP-QCS does not use 3rd party websites or applications. SNAP-QCS is under the FNS-5 SORN.

10.10 Does the system use web measurement and customization technology?

No

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

Not Applicable.

10.12 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. SNAP-QCS does not use 3rd party websites or applications.



Responsible Officials

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