

# Privacy Impact Assessment SNAPQCS

Program, Accountability and Administration Division

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# **Privacy Impact Assessment for the Supplemental Nutrition Assistance Program Quality Control System (SNAPQCS)**

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## Abstract

Supplemental Nutrition Assistance Program Quality Control System (SNAPQCS). The SNAPQCS 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 SNAPQCS 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.

SNAPQCS does not collect data from customers. SNAPQCS 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 SNAPQCS 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?





SNAPQCS contains Certification Case Number (CCN) supplied by the Supplemental Nutrition Assistance Program (SNAP) State Agencies. For some states, this CCN contains a social security number. SNAPQCS treats this number as a unique identifier in order to assist in following up with State Agencies on particular records. Only a limited number of states use the social security number in their CCNs. No other privacy information is received or stored by SNAPQCS.

**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 supply all data.

**1.5 How will the information be checked for accuracy?**

SNAPQCS does not treat the CCN as privacy data but as a case number for reference to State Agency data.

**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.**

SNAPQCS does not collect data from customers. SNAPQCS collects data from State Agencies. Some State Agencies embed the SSN in their CCNs. CCNs are used by SNAPQCS as a reference number relating back to the State Agency.

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**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.**

SNAPQCS treats the CCN as a unique identifier in order to assist in following up with State Agencies on particular records. SNAPQCS does not treat this number as a social security number. SNAPQCS does not generate this number.

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

All data is 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 SNAPQCS database and provided to ORA via disk on an annual 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 SNAPQCS and this may, in some cases, contain SSNs. However, no names or other information about the individual are input. Therefore there is little risk that an individual can be associated with a given SSN. SNAPQCS 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. State agencies input the required information into SNAPQCS. Some State Agencies embed the SSN in their CCNs. CCNs are used by SNAPQCS as a reference number relating back to the State Agency. SNAPQCS does not share PII data.

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

State agencies submit required information through the system directly (HTTPS).

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

State agencies input the required information into SNAPQCS and this may, in some cases, contain SSNs. However, no names or other information about the individual are input. Therefore there is little risk that an individual can be associated with a given SSN.

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

SNAPQCS does not collect data from customers. SNAPQCS collects data from State Agencies. Some State Agencies embed the SSN in their CCNs. CCNs are used by SNAPQCS as a reference number relating back to the State Agency.

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

Not Applicable





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

Not Applicable

**6.4 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 SNAPQCS

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

This would be a State Agency concern. Not Applicable to SNAPQCS

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

This would be a State Agency concern. Not Applicable to SNAPQCS

**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 SNAPQCS

**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 SNAPQCS





## 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 the FNS CSAMS system 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 Certification and Accreditation prior to being put into production. The last C&A was completed on October 2010.

### **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?**

SNAPQCS does not treat the CCN as privacy data but as a case number for reference to State Agency data. 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?

SNAPQCS 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 3<sup>rd</sup> party websites and/or applications?

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.

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

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.





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

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.

**10.5 How will the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.

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

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.

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

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.

**10.8 With whom will the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications be shared - either internally or externally?**

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.

**10.9 Will the activities involving the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a system of records notice (SORN)?**

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications.

**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 3<sup>rd</sup> party websites and/or applications, discuss the privacy risks identified and how they were mitigated.**

Not Applicable. SNAPQCS does not use 3<sup>rd</sup> party websites or applications

## Responsible Officials

John Coulter, FNS, OIT, PMO, PMB  
United States Department of Agriculture

## Approval Signature

*Ronald K. Ward*

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