

For: State and County Offices

Core PII and Identity Verification PII Improperly Entered Into Free Form Data Fields

Approved by: Deputy Administrator, Farm Programs



1 Overview

A Background

Several forms and screens in current software applications allow for free form text/data entry. A review of the centralized databases has indicated that core PII and identity verification PII has been improperly entered into free form data fields. FSA offices shall see Notice AS-2179 to identify core PII and identity verification PII data types.

Note: A free form data field is a field that uses an unstructured/open format. The unstructured/open format allows users to enter any text/data.

B Purpose

This notice:

- obsoletes Notice AS-2181
- obsoletes Notice CM-645
- informs State and County Offices that the data entered into the free form data fields:
 - shall **not** contain core PII and/or identity verification PII
 - enters into centralized databases
 - prints out on certain forms (for example; data entered into the Farm Records Management System, Tract Data Screen, “Description” field appears on FSA-156EZ under the “Identifier” heading)
 - appears in certain software applications
 - may be embedded within records that **must** be disclosed to members of the public in response to FOIA requests.

Disposal Date	Distribution
January 1, 2010	State Offices; State Offices relay to County Offices

Notice CM-646

1 Overview (Continued)

C Contact

If there are questions about this notice, contact John W. Underwood, Privacy Act Officer/ PII Officer at either of the following:

- e-mail to john.underwood@kcc.usda.gov
- telephone at 816-926-6992.

2 Action

A Completing Free Form Data Fields

Core PII and identity verification PII shall **only** be entered into data fields that have been specifically designated and approved to contain PII data types. Core PII and identity verification PII data shall **not** be entered into any free form data fields. All free form data fields shall be reviewed and corrected if applicable. Special emphasis is currently being placed on correcting the “Farm Identifier” and “Tract Description” free form data fields.

B County Office Action

County Offices shall:

- **immediately** discontinue entering core PII and identity verification PII into any free form data field contained in any software application
- enter data into each software application data field **strictly** according to the appropriate program guidance/instructions
- **not** use data fields for any reason other than the specified intent of that data field (for example; the free form data fields shall **not** be used as a “comments block” for text/data that may **not** be entered into in other data fields)
- upon identifying an improper entry, **immediately** remove the core PII and identity verification PII improperly entered into free form data fields
- immediately, but no later than **July 24, 2009**, review and remove **all** core PII and identity verification PII from the “Farm Identifier” and “Tract Description” free form data fields for 2003 through 2009. See 3-CM for procedure on updating the “Farm Identifier” and “Tract Description” free form data fields
- report to the State Office when the County Office has successfully reviewed and removed the core PII and identity verification PII from the “Farm Identifier” and “Tract Description” free form data fields

Notice CM-646

2 Action (Continued)

B County Office Action (Continued)

- immediately notify the State Office upon discovering core PII or identity verification PII improperly entered into any other free form data field contained in a software application, other than the “Farm Identifier” or “Tract Description” fields.

C State Office Action

State Offices shall:

- ensure that County Offices comply with this notice
- upon identifying an improper entry, instruct the appropriate County Office to remove the core PII and identity verification PII from the free form data field
- ensure that County Offices remove **all** core PII and verification PII from the “Farm Identifier” and “Tract Description” free form data fields for 2003 through 2009
- track County Office progress towards removing the core PII and identity verification PII that has been improperly entered into free form data fields
- certify when the County Office has reviewed and removed the core PII and identity verification PII from the “Farm Identifier” and “Tract Description” free form data fields for 2003 through 2009. The certification shall be e-mailed to Sandy Bryant by COB on **July 24, 2009**, to **sandy.bryant@wdc.usda.gov**
- notify John Underwood, according to subparagraph 1 C, of any other free form software application data field with improperly entered core PII or identity verification PII **not** specifically designated and approved to contain PII data types.

D National Office Action

The National Office is currently working to develop a query for Sys36 that will display the “Farm Identifier” and “Tract Description” free form data fields for 2003 through 2009. The query will be used as a tool to assist County Office review and removal of core PII and identity verification PII. A notice will be issued the week of June 29, 2009, with further information.