Privacy Impact Assessment

IDEA

Revision: 1.0

Natural Resource Conservation Service

Date: Nov 2007

USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: Natural Resource Conservation Service

System Name:

System Type: ☒ **Major Application**
☐ **General Support System**
☐ **Non-major Application**

System Categorization (per FIPS 199): ☐ **High**
☐ **Moderate**
☒ **Low**

Description of the System:

The objective of IDEA is to develop a comprehensive and fully integrated enterprise business intelligence platform whose architecture, integration, and simplicity permeate every level of the organization – executive, analytical, and operational and make necessary data available, accessible, and meaningful to every person or application that needs it, when and how they need it. IDEA will provide a framework, information products, and a vision of how the Natural Resources Conservation Service (NRCS) can efficiently and effectively meet the growing demands, internally and externally, for timely, accurate, credible, and repeatable information.

The fundamental concepts for IDEA surround the need and goal to provide a corporately recognized strategy for data access, analysis and reporting of NRCS data. As a result of changes in business circumstances and other factors, corporate information systems that originally and currently have been running independently are now required to cooperate to share data throughout the agency.

Who owns this system? (Name, agency, contact information**)**

Dennis Lytle, IT Operations Branch Chief, USDA-NRCS, Dennis.Lytle@ftc.usda.gov, 970-295- 5485.

Who is the security contact for this system? (Name, agency, contact information**)**

Chuck Hart, Information System Security Manager, USDA-NRCS, Chuck.Hart@ftc.usda.gov, (970) 295-5550.

Who completed this document? (Name, agency, contact information**)**

Ray Coleman, Systems Security Analyst, USDA NRCS Contractor,
ray.coleman@ftc.usda.gov, 970-2955-5570.

DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?

Indicate whether the following types of personal data are present in the system

QUESTION 1 Does the system contain any of the following type of data as it relates to individual:	Citizens	Employees
Name	**Yes**	**Yes**
Social Security Number	**No**	**No**
Telephone Number	**No**	**Yes**
Email address	**No**	**Yes**
Street address	**No**	**Yes**
Financial data	**Yes**	**No**
Health data	**No**	**No**
Biometric data	**No**	**No**
QUESTION 2 Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.? NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code[1]	**No**	**No**
Are social security numbers embedded in any field?	**No**	**No**
Is any portion of a social security numbers used?	**No**	**No**
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	**No**	**No**

If all of the answers in Questions 1 and 2 are NO,
You do not need to complete a Privacy Impact Assessment for this system and the answer to
OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets,
Part 7, Section E, Question 8c is:
3. No, because the system does not contain, process, or transmit personal identifying information.

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[1] Comments of Latanya Sweeney, Ph.D., Director, Laboratory for International Data Privacy Assistant Professor of Computer Science and of Public Policy Carnegie Mellon University To the Department of Health and Human Services On "Standards of Privacy of Individually Identifiable Health Information". 26 April 2002.

If any answer in Questions 1 and 2 is YES, provide complete answers to all questions below.

DATA COLLECTION
3. Generally describe the data to be used in the system.
    Categories of Data:
    - Financial Management
    - Public/Employee
    - Natural Resource Data

    Categories of Users:
    - NRCS Employees
    - Affiliates – (i.e., Contractors, TSP, etc…)

4. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.

    ☒ Yes
    ☐ No

5. Sources of the data in the system.
    5.1. What data is being collected from the customer?

N/A – IDEA does not collected data from Customers

    5.2. What USDA agencies are providing data for use in the system?
    - NRCS
    - FSA

    5.3. What state and local agencies are providing data for use in the system?

    N/A

    5.4. From what other third party sources is data being collected?

    N/A

6. Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e. NFC, RD, etc.) or Non-USDA sources.

☐ Yes
☒ No. If NO, go to question 7

    6.1. How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?

    6.2. How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?

    6.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?

DATA USE

7. Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?

The principle purpose of IDEA is to provide planning summary reports for operational and strategic planning. Furthermore, IDEA pulls data from existing systems and does not pull data from the public.

8. Will the data be used for any other purpose?

☐ Yes
☒ No. If NO, go to question 9

    8.1. What are the other purposes?

9. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President

☒ Yes
☐ No

10. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e. aggregating farm loans by zip codes in which only one farm exists.)?

☐ Yes
☒ No. If NO, go to question 11

    10.1.   Will the new data be placed in the individual's record (customer or employee)?

☐ Yes
☐ No

    10.2.   Can the system make determinations about customers or employees that would not be possible without the new data?

☐ Yes
☐ No

    10.3.   How will the new data be verified for relevance and accuracy?

11. Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?

To Provide Planning summary reports for operational and strategic planning.

12. Will the data be used for any other uses (routine or otherwise)?

☐ Yes
☒ No. If NO, go to question 13

    12.1.   What are the other uses?

13. Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?

☒ Yes
☐ No. If NO, go to question 14

13.1.   What controls are in place to protect the data and prevent unauthorized access?

   IDEA will use E-Auth and IAS Roles

14. Are processes being consolidated?

☐ Yes
☒ No. If NO, go to question 15

14.1.   What controls are in place to protect the data and prevent unauthorized access?

DATA RETENTION

15. Is the data periodically purged from the system?

☒ Yes
☐ No. If NO, go to question 16

15.1.   How long is the data retained whether it is on paper, electronically, in the system or in a backup?

IDEA database will be overwritten nightly during the marting process

15.2.   What are the procedures for purging the data at the end of the retention period?
IDEA database will be overwritten nightly during the marting process

15.3.   Where are these procedures documented?
Procedures are located within CoLab

16. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

Data is maintained for Historical purpose and the status of that data will remain accurate until IDEA does a predefined nightly pull of data from external sources.

17. Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

☒ Yes
☐ No

DATA SHARING

18. Will other agencies share data or have access to data in this system (i.e. international, federal, state, local, other, etc.)?

☐ Yes
☒ No. If NO, go to question 19

    18.1.   How will the data be used by the other agency?

    18.2.   Who is responsible for assuring the other agency properly uses of the data?

19. Is the data transmitted to another agency or an independent site?

☐ Yes
☒ No. If NO, go to question 20

    19.1.   Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

20. Is the system operated in more than one site?

☐ Yes
☒ No. If NO, go to question 21

    20.1.   How will consistent use of the system and data be maintained in all sites?

DATA ACCESS

21. Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?
- IDEA application – National and State field reps, TSP, NRCS, employees

- IDEA Database – developers, and DBAs

22. How will user access to the data be determined?

Access to IDEA is for NRCS employees and affiliates who have assigned areas of responsibility and a valid need to know.

22.1.   Are criteria, procedures, controls, and responsibilities regarding user access documented?

☒ Yes
☐ No

23. How will user access to the data be restricted?
User will be required to follow the system account access request process, and IDEA will use E-Auth as its Authentication module and IAS Roles as it authorization model.

23.1.   Are procedures in place to detect or deter browsing or unauthorized user access?

☒ Yes
☐ No
IDEA will inherit the system/network infrastructure of the WFCS GSS.

24. Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

☐ Yes
☒ No

CUSTOMER PROTECTION

25. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e. office, person, departmental position, etc.)?

NRCS

26. How can customers and employees contact the office or person responsible for protecting their privacy rights?

    Customers and employees can contact the NRCS Security Response/Access Control Team via the NRCS 800 number and/or e-mail address. Additionally, each state has an Information System Security Point of Contact (ISSPOC) and a State Administrative Officer (SAO) that can be contacted at their Center or State Office.

27. A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?

    ☒ Yes. If YES, go to question 28
    ☐ No

    27.1.   If NO, please enter the POAM number with the estimated completion date:

28. Consider the following:
- Consolidation and linkage of files and systems
- Derivation of data
- Accelerated information processing and decision making
- Use of new technologies

Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?

    ☐ Yes
    ☒ No. If NO, go to question 29

    28.1.   Explain how this will be mitigated?

29. How will the system and its use ensure equitable treatment of customers?

N/A, IDEA collects data from existing sources. (Systems)

30. Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

    ☐ Yes
    ☒ No. If NO, go to question 31

    30.1.   Explain

SYSTEM OF RECORD

31. Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?

☐ Yes
☒ No. If NO, go to question 32

31.1.   How will the data be retrieved? In other words, what is the identifying attribute (i.e. employee number, social security number, etc.)?

31.2.   Under which Systems of Record notice (SOR) does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov)

31.3.   If the system is being modified, will the SOR require amendment or revision?

TECHNOLOGY

32. Is the system using technologies in ways not previously employed by the agency (e.g. Caller-ID)?

☐ Yes
☒ No. If NO, the questionnaire is complete.

32.1.   How does the use of this technology affect customer privacy?

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

PLEASE SUBMIT A COPY TO
THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY
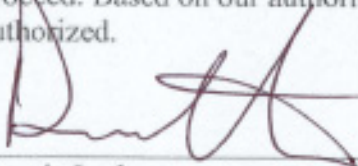
Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

__Natural Resource Conservation Service - IDEA__

This document has been completed in accordance with the requirements of the EGovernment Act of 2002.
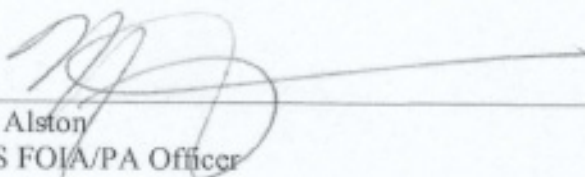
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.
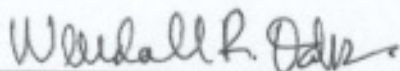
Dennis Lytle
System Owner

5-28-08
Date

Mary Alston
NRCS FOIA/PA Officer

5-21-08
Date

Wendall R. Oaks
Acting NRCS CIO

5-22-08
Date