Privacy Impact Assessment

Grazing Land Spatial Analysis Tool

Revision: 1.0

Natural Resources Conservation Service

Date: June 2007

USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: Natural Resource Conservation Service

System Name: Grazing Land Spatial Analysis Tool

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

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

Description of the System:
The Grazing Lands Technology Institute (GLTI) provides technical excellence to the natural Resources Conservation Service (NRCS) and other appropriate customers in the acquisition, development, coordination, and transfer of technology that meets the needs of grazing land resources, landowners and managers, and the public.

Who owns this system? (Name, agency, contact information**)**
Wendell Oaks, Director ITC, USDA-NRCS, Wendell.Oaks@ftc.usda.gov, 970-295-5479

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**	**NO**
Social Security Number	**NO**	**NO**
Telephone Number	**YES**	**NO**
Email address	**YES**	**NO**
Street address	**YES**	**NO**
Financial data	**NO**	**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]	**YES**	**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, STOP
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.

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

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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.

DATA COLLECTION

3. Generally describe the data to be used in the system.

> **Categories of information:**
> - Cattle
> - Live Stock
> - Management of Live stock

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.

$\boxtimes$ Yes
$\square$ No

5. Sources of the data in the system.

5.1. What data is being collected from the customer?

The Grazing Land Spatial Analysis tool and pull business contact and geographical locations and Field Delineations from CST.

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

5.3. What state and local agencies are providing data for use in the system?
None

5.4. From what other third party sources is data being collected?
None

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

$\square$ Yes
$\boxtimes$ 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?

To provides technical excellence to the Natural Resources Conservation Service (NRCS) and other appropriate customers in the acquisition, development, coordination, and transfer of technology that meets the needs of grazing land resources, landowners and managers, and 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?

This is a program that resides on the user's computer, can be executed on an as needed basis by the user (Range Conservationist).   If users have a CST account they can import Business contact information, geographical location and field delineation information from CST.

The range Conservationist will be able to pull up the following information about an individual:
     Each user can produce the following reports:
- Inventory
- Production Summary
- Scheduling
- Herd summary

There is no personal information in any of these reports.

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?

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?

This application in a stand alone application and will inherits the security controls of the system and network infrastructure when applicable.

DATA RETENTION

15. Is the data periodically purged from the system?

☐ Yes
☒ No. If NO, go to question 16

N/A, This system uses input files and does not store data.

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

15.2.　　What are the procedures for purging the data at the end of the retention period?

15.3.　　Where are these procedures documented?

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?

    N/A, This system uses input files and does not store data.

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

Only Range Conservationist

  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?

Version Controlled through NRCS, if access is requested it needs to be submitted in writing to ITS and approved by a NRCS Range Conservationist.

DATA ACCESS

21. Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?   Range Conservationist

22. How will user access to the data be determined?
Version Controlled through NRCS, if access is requested it needs to be submitted in writing to IT'S and approved by a NRCS Range Conservationist. Additionally, the application will inherit the security controls of the system and network infrastructure.

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

☒ Yes
☐ No

23. How will user access to the data be restricted?
This application inherits the security controls of the hosting system/network infrastructure.

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

☒ Yes
☐ No
This application inherits the security controls of the system and network infrastructure

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 Range Conservationists are the users of this application. It is each individual Range Conservationist responsibility and the inherited system/network infrastructure security controls to protect privacy rights of each customer.

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?

All NRCS systems/applications are versioned controlled through NRCS and will inherit the security controls of the hosting system/network infrastructure(s).

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?

N/A, technology does not 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:

1. Yes.

PLEASE SUBMIT A COPY TO
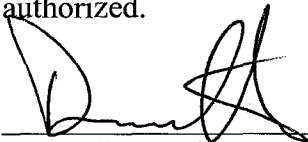THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Grazing Land Spatial Analysis Tool

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.

_____   5-16-08
Wendall R. Oaks   Date
System Owner

_____   4-29-08
Mary Alston   Date
NRCS FOIA/PA Officer

Wendall R. Oaks acting CIO   5-12-08
Jack Carlson   Date
NRCS CIO