



Privacy Impact Assessment

National Resource Inventory Applications (NRI)

Revision: 1.0

Natural Resources Conservation Service

Date: June 2007

Sensitive But Unclassified/Sensitive Security Information – Disseminate on a Need-To-Know Basis Only

Template Release 070606

USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: Natural Resource Conservation Service

System Name: National Resource Inventory (NRI)

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

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

Description of the System:

NRI data, in conjunction with Performance Results Measurement System data and agri-environmental models, provides a scientifically defensible assessment of the environmental impacts of Farm Bill program implementation.

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	Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:		
Name	NO	YES
Social Security Number	NO	NO
Telephone Number	NO	YES
Email address	NO	YES
Street address	NO	YES
Financial data	NO	NO
Health data	NO	NO
Biometric data	NO	NO
QUESTION 2	NO	NO
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		
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.

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

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.

The NRI provides a nationally consistent database for all nonfederal lands; features data on resource trends, gathered and monitored in 1982, 1987, 1992, 1997, and 2001 by thousands of technical and natural resource data collection experts; and it has a direct correlation with soils data, which permits analysis of resources in relation to the capability of the land and in terms of soils resources and conditions. The data includes tabular data, spatial data, imagery, and elevation data.

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?

The information is only collected from the employees and is stored within the NRI Data Warehouse.

No private information is collected from the public for storage in the system. There is an order form on the NRI website, for customers to order a CD of the data. This form is e-mailed, the order processed and then the e-mail is hard copy filed and then shredded after the disposition. The financial information is also sent for handling to Financial Management to pay for the CD. <http://www.ncgc.nrcs.usda.gov/products/nri/order.html>,

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

USDA NRCS and FSA federal and contracted employees.

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.

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?

No data is collected from sources other than USDA.

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?

No data is collected from sources other than USDA.

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?

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?

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?

All data within NRI is certified. The history of the data is also essential and therefore is maintained. Data is reviewed yearly for the core 40,000 and a rotating schedule is used annually for an additional 35,000 sample points.

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

Information derived from the NRI is used by natural resource managers; policymakers; analysts; consultants; the media; other Federal agencies; State governments; universities; environmental, commodity, and farm groups; and the public.

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

The constituents use NRI information to formulate effective public policies, fashion agricultural and natural resources legislation, develop State and national conservation programs, allocate USDA financial and technical assistance in addressing natural resource concerns, and enhance the public's understanding of natural resources and environmental issues.

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

Resource Inventory and Analysis Division

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?

The NRI Data Mart is located in Fort Worth, TX at the National Cartography and Geospatial Center (NCGC) and the NRI Database containing tabular and spatial data is located in Ames, IA at Iowa Stat University. The data from both are sent to the RSLs on a nightly basis via OnCourse software.

DATA ACCESS

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

The information from the order form for the CDs is only accessible to NRCS employees and the National Finance Center (NFC) for processing the payment.

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

Each data collector receives training and is certified before they are allowed access to the NRI Data Collection Instruments. Each application is also individually loaded onto the CCE workstation and therefore the RSL Managers control the access to the software.

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

Yes
 No

23. How will user access to the data be restricted?

The OAsys application is read only and requires an eAuthentication Role for access.

Each RSL has access to their region's data only. Access to the data is read or update depending on the employee's training and certification.

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

Yes

No

RSL managers certify employees for access. Only certified and trained RSL employees may have the software installed on their CCE workstation and Admin login is required for installation of the software.

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

Yes
 No

Access is based on Roles

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.)?

No privacy act information is stored in the system

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.)?

The data within NRI can be retrieved by the Remote Sensing Labs (RSLs) and the data collectors. This data is retrieved via the software and an Active Directory ID and password.

Public access to the 1997 data is available on a CD which can be ordered through the NRI website. There is also some additional data information available to the public on the NRI website.

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)

Notice of Privacy Act System of Records by Owner, Operator or Producer Files (or Volunteer / Employee Files) USDA/NRCS-1.
http://www.nrcs.usda.gov/about/foia/408_45.html.

- 31.2. If the system is being modified, will the SOR require amendment or revision?
NO

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.

NRI uses a Radio Frequency ID on the hard copy folders for the PSU. This RF ID maintains a tracking record for custody of the folder.

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

No privacy issues arise from the use of this technology. There is no individual information about members of the public collected. Employees who collect the data are recorded for quality assurance purposes but not distributed out of the business area.

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.

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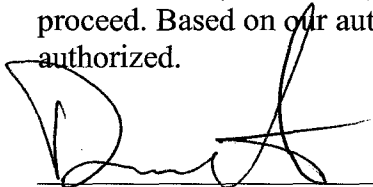
Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

National Resource Inventory Applications (NRI) _____

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.



Wendall R. Oaks
System Owner

Date

5-16-08



Mary Alston
NRCS FOIA/PA Officer

Date

4-29-08



Jack Carlson
NRCS CIO

Date

5-16-08