



# **Privacy Impact Assessment**

## ***Office Information Profile (OIP)***

***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:** National Resource Conservation Service (NRCS)

**System Name:** Office Information Profile (OIP)

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

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

### **Description of the System:**

The Office Information Profile (OIP) system provides comprehensive office information for Farm Service Agency (FSA), Natural Resources Conservation Service (NRCS), Rural Development (RD) offices, plus partner organization offices. This information identifies office locations, the agencies present, mailing and shipping addresses, phone numbers, and Agency representatives designated as points of contact. OIP also serves as an interface with the public, allowing easy access to contact information for any service center office (SCO) or Service Center Agency (SCA) partner site.

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

Wendell Oaks, Director ITC, USDA-NRCS, [Wendell.Oaks@ftc.usda.gov](mailto: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](mailto: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](mailto:ray.coleman@ftc.usda.gov), 970-2955-5570.

Sandy Williams, Sr. Systems Security Analyst, USDA NRCS Contractor, [sandy.williams@ftc.usda.gov](mailto:sandy.williams@ftc.usda.gov), 970-295-5558

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

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

<b>QUESTION 1</b>	Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:		
Name	<b>NO</b>	<b>YES</b>
Social Security Number	<b>NO</b>	<b>NO</b>
Telephone Number	<b>NO</b>	<b>YES</b>
Email address	<b>NO</b>	<b>YES</b>
Street address	<b>NO</b>	<b>YES</b>
Financial data	<b>NO</b>	<b>NO</b>
Health data	<b>NO</b>	<b>NO</b>
Biometric data	<b>NO</b>	<b>NO</b>
<b>QUESTION 2</b>	<b>NO</b>	<b>NO</b>
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 <sup>1</sup>		
Are social security numbers embedded in any field?	<b>NO</b>	<b>NO</b>
Is any portion of a social security numbers used?	<b>NO</b>	<b>NO</b>
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	<b>NO</b>	<b>NO</b>



**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.

<sup>1</sup> 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.

This information identifies office locations, the agencies present, mailing and shipping addresses, phone numbers, and Agency representatives designated as points of contact. OIP also serves as an interface with the public, allowing easy access to contact information for any service center office (SCO) or Service Center Agency (SCA) partner site.

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?

Employee Directory provides business contact information on any USDA person in NRCS, FSA, or RD.

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

NRCS, FSA, RD and OCIO provide data for use in the OIP system.

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

Local Conservation Districts (CD).

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?

Data steward roles have been assigned at the National, State and Local level who are responsible for the accuracy of the data. Also, data will be checked for completeness via database design and application requirements.

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

Data steward roles have been assigned at the National, State and Local level who are responsible for the accuracy of the data. Also, data will be checked for completeness via database design and application requirements.

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

Data steward roles have been assigned at the National, State and Local level who are responsible for the accuracy of the data. Also, data will be checked for completeness via database design and application requirements.

## 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?

This information identifies office locations, the agencies present, mailing and shipping addresses, phone numbers, and Agency representatives designated as points of contact. OIP also serves as an interface with the public, allowing easy access to contact information for any service center office (SCO) or Service Center Agency (SCA) partner site.

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

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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?

The State FACs is responsible for the relevance and accuracy of the data.

**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?

The only thing OIP displays about individuals is their name, job title, business phone number, business email address and office they work from.

**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?

The OIP system owner identifies very specific access privileges and authority. Each user is restricted to specific actions by the software applications and to specific web screens by the eAuthentication security system.

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?

N/A

## 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?

Data Steward roles have been assigned at the National, State and Local level who are responsible for the accuracy of the 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

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

Data will be used by the agency to provide comprehensive office information for FSA, NRCS, RD offices, plus partner organization offices.

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

OIP System Owner

**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.)?

The OIP system users may include anyone within the NRCS, RD, and FSA agencies including State OIP Data Stewards and those whose job responsibilities require a need for OIP system data access. Select information is also provided to the general public for Web browser viewing.

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

All access is through application systems that control what information a particular user can view and update. Specific applications and user privileges are assigned to employees and contractors' dependant on the user's need-to-know. Procedures, controls and responsibilities regarding access are documented.

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 general public, USDA users, and a subset of NRCS, RD, and FSA employees have read-only access to one or more of the eight internal applications to perform their duties. Most of the eight applications have a small group of users or administrators that have write access to their information so that they can update it. Access is restricted to specific actions by the software applications and to specific web screens by the eAuthentication security system.

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

- Yes  
 No

**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?

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](http://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:

**1. Yes.**

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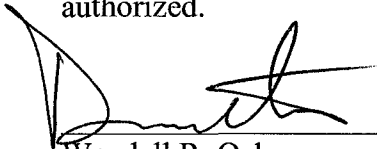
## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Office Information Profile (OIP)

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

5-16-08


Date



Mary Alston  
NRCS FOIA/PA Officer

4-29-08

Date



Jack Carlson  
NRCS CIO

5-16-08

Date