



# **Privacy Impact Assessment**

*Resource Data Gateway  
(RDG)*

***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 Resources Conservation Service

**System Name:** Resource Data Gateway

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

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

### Description of the System:

The mission of the Natural Resources Conservation Service (NRCS) is to provide leadership in a partnership effort to help people conserve, maintain, and improve the nation's natural resources and environment. NRCS assists owners of America's private land with conserving their soil, water, and other natural resources. NRCS delivers technical assistance based on sound science and suited to a customer's specific needs.

As directed by the Secretary of Agriculture's March 16, 1998 memorandum, the Natural Resources Conservation Service (NRCS), Farm Service Agency (FSA), and Rural Development (RD) agencies co-located offices, modernized business processes, and partnered to achieve a "one-stop service" for United States Department of Agriculture (USDA) customers at their county-based field offices (Service Centers). One of the major components of the modernization initiative involved the implementation of a Geographic Information System (GIS) across each of the Partner Agencies and in all 2,550 Service Center offices. A Geospatial Data Gateway Team (aka Resource Data Gateway or just Gateway) was chartered with developing a mechanism to deliver geospatial data to users in the Partner Agencies.

The Geospatial Data Gateway allows users to identify an area of interest, select available geospatial data for that area, and provides packaging and order fulfillment of geospatial data in support of conservation programs, analyzing and reporting progress, and management applications.

**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.

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**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.

**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>YES</b>	<b>YES</b>
Social Security Number	<b>NO</b>	<b>NO</b>
Telephone Number	<b>YES</b>	<b>YES</b>
Email address	<b>YES</b>	<b>YES</b>
Street address	<b>YES</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.**

<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.

USDA PRIVACY IMPACT ASSESSMENT FORM

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.

To provide leadership in a partnership effort to help people conserve, maintain, and improve the nation's natural resources and environment. NRCS assists owners of America's private land with conserving their soil, water, and other natural resources. NRCS delivers technical assistance based on sound science and suited to a customer's specific needs.

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?

RDG gets geospatial data from NRCS, FSA, Census Bureau, USGS, EPA-FEMA, InterMap and TeleAtlas. The geospatial data is housed at the Farm Service Agency (FSA) Air Photo Field Office (APFO) in Salt Lake City, UT and at the National Cartographic and Geographic Center (NCGC) in Fort Worth, Texas. The RDG application resides in the Fort Collins WebFarm. Since this is a portal system with the data at other locations, the system is vulnerable to network outages and bottlenecks. The APFO computer systems are old and do not have enough storage. In addition, the telecommunications from APFO is slow and unpredictable. They do not have adequate bandwidth and they are routed through the hub in Kansas City (SCA). Due to these factors the data services from APFO frequently have to be shutdown until the space or network issues are resolved.

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

USDA – Natural Resources Conservation Service; augmented with specific tabular and spatial information shared by the USDA – Farm Service Agency, CENSUS Bureau, EPA-FEMA and USGS.

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?

Data and licenses have been purchased from InterMap and TeleAtlas.

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?

No other user data is collected. Geospatial data received comply with SCI geospatial standards including SCI Std 003, *Standard for Geospatial Data Set Metadata*, SCI Std 005, *Standard for Geospatial Feature Metadata*, SCI Std 007, *Standard for Geospatial Data*, and the *USDA Service Center Initiative Directory Structure and File Naming Convention Change Control Policy*, SCI Std 004-01, *Standard for Geospatial Dataset File Naming*. Changes to the system or geospatial data are placed staging server for thorough testing and review by appropriate personnel. Once approved by system owner and the project manager, the production site is updated. All changes and approvals are documented through CoLab tracker.

Additionally, User data is received through a form with “required” fields. The data input is not validated or checked for completeness.

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

No other user data is collected. Geospatial data received comply with SCI geospatial standards including SCI Std 003, *Standard for Geospatial Data Set Metadata*, SCI Std 005, *Standard for Geospatial Feature Metadata*, SCI Std 007, *Standard for Geospatial Data*, and the *USDA Service Center Initiative Directory Structure and File Naming Convention Change Control Policy*, SCI Std 004-01, *Standard for Geospatial Dataset File Naming*. Changes to the system or geospatial data are placed staging server for thorough testing and review by appropriate personnel. Once approved by system owner and the project manager, the production site is updated. All changes and approvals are documented through CoLab tracker.

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

No other user data is collected. Geospatial data received comply with SCI geospatial standards including SCI Std 003, *Standard for Geospatial Data Set Metadata*, SCI Std 005, *Standard for Geospatial Feature Metadata*, SCI Std 007, *Standard for Geospatial Data*, and the *USDA Service Center Initiative Directory Structure and File Naming Convention Change Control Policy*, SCI Std 004-01, *Standard for Geospatial Dataset File Naming*. Changes to the system or geospatial data are placed staging server for thorough testing and review by appropriate personnel. Once approved by system owner and the project manager, the production site is updated. All changes and approvals are documented through CoLab tracker.

Additionally, User data is received through a form with “required” fields. The data input is not validated or checked for 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 identify an area of interest, select available geospatial data for that area, and provides packaging and order fulfillment of geospatial data in support of conservation programs, analyzing and reporting progress, and management applications.

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

No, all data collection is known to the customer. The aggregate of all data stores does not produce new revelations except in aggregations that produce agency-level statistics on program delivery.

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?

No other user data is collected. Geospatial data received comply with SCI geospatial standards including SCI Std 003, *Standard for Geospatial Data Set Metadata*, SCI Std 005, *Standard for Geospatial Feature Metadata*, SCI Std 007, *Standard for Geospatial Data*, and the *USDA Service Center Initiative Directory Structure and File Naming Convention Change Control Policy*, SCI Std 004-01, *Standard for Geospatial Dataset File Naming*. Changes to the system or geospatial data are placed staging server for thorough testing and review by appropriate personnel. Once approved by system owner and the project manager, the production site is updated. All changes and approvals are documented through CoLab tracker.

Additionally, User data is received through a form with "required" fields. The data input is not validated or checked for completeness.

**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 identify an area of interest, select available geospatial data for an area, and provides packaging and order fulfillment of geospatial data in support of conservation programs, analyzing and reporting progress, and management applications.

**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

There are no defined retention periods for customer data entered into the system. The longevity of the system is not known, but data regularly outlives a particular processing system. Legal requirement for data retention are adhered to, as applicable.

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?

No other user data is collected. Geospatial data received comply with SCI geospatial standards including SCI Std 003, *Standard for Geospatial Data Set Metadata*, SCI Std 005, *Standard for Geospatial Feature Metadata*, SCI Std 007, *Standard for Geospatial Data*, and the *USDA Service Center Initiative Directory Structure and File Naming Convention Change Control Policy*, SCI Std 004-01, *Standard for Geospatial Dataset File Naming*. Changes to the system or geospatial data are placed staging server for thorough testing and review by appropriate personnel. Once approved by system owner and the project manager, the production site is updated. All changes and approvals are documented through CoLab tracker.

Additionally, User data is received through a form with “required” fields. The data input is not validated or checked for completeness.

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.)?

System managers, developers, and NRCS managers

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

Users do not have access to databases and data. All access is through application systems that control what information a particular user can view and update. Database administrators control and grant permissions for access to specific databases as authorized by the business application owners.

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

- Yes  
 No

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

Customers do not have access to Gateway customer data. NRCS employee's access is restricted to specific actions by the software applications and to specific data by the eAuth 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.)?

System Owner

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

Data is only accessible through business applications. Customers have no direct access to the data.

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.**

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

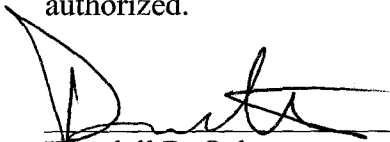
## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Resource Data Gateway (RDG)

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

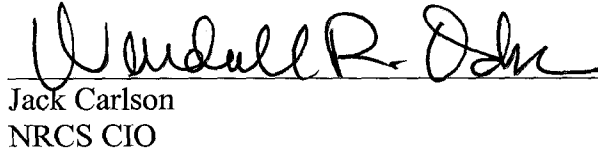
5-16-08



Mary Alston  
NRCS FOIA/PA Officer

Date

4-29-08



Jack Carlson  
NRCS CIO

Date

5-16-08