



# **Privacy Impact Assessment**

## ***Earth Team Volunteers***

***Revision: 1.0***

***Natural Resources Conservation  
Service***

***Date: June 28, 2007***

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

Template Release 070606



## USDA PRIVACY IMPACT ASSESSMENT FORM

**Agency:** USDA NRCS

**System Name:** Earth Team Volunteers

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

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

### Description of the System:

The Earth Team has been around since 1981, when Congress passed legislation allowing NRCS to use volunteers in all programs. Congress passed legislation – Section 1526 of PL97-98, Food and Agriculture Act – in 1981 permitting the Natural Resources Conservation Service (NRCS) to use volunteers. In 1985, the volunteer effort was organized as the Earth Team, primarily due to the Farm Bill and the increased workload of NRCS. The primary purpose of the Earth Team is to expand NRCS services by using volunteer time, talent and energy to help accomplish the NRCS mission. The Earth Team Volunteers application tracks volunteer hours and proper names.

**Who owns this system?** Wendall R. Oaks, IT Application Development Branch Chief, USDA-NRCS, [wendall.oaks@ftc.usda.gov](mailto:wendall.oaks@ftc.usda.gov), 970-492-5479.

**Who is the security contact for this system?** 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?** Sandy Williams, Sr. Systems Security Analyst/CISSM, [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>YES</b> | <b>NO</b> |
| Social Security Number   | <b>NO</b>  | <b>NO</b> |
| Telephone Number   | <b>YES</b> | <b>NO</b> |
| Email address  | <b>YES</b> | <b>NO</b> |
| Street address   | <b>YES</b> | <b>NO</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>YES</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.

The Earth Team has been around since 1981, when Congress passed legislation allowing NRCS to use volunteers in all programs. Congress passed legislation – Section 1526 of PL97-98, Food and Agriculture Act – in 1981 permitting the Natural Resources Conservation Service (NRCS) to use volunteers. In 1985, the volunteer effort was organized as the Earth Team, primarily due to the Farm Bill and the increased workload of NRCS. The primary purpose of the Earth Team is to expand NRCS services by using volunteer time, talent and energy to help accomplish the NRCS mission. The Earth Team Volunteers application tracks volunteer hours and proper names.

**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?

Name, address, telephone number and optional email address.

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

NRCS

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?

Solely reliant on the citizen to put in accurate information when filling out the form to be an Earth Team Volunteer.

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

N/A

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

N/A

## 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 Earth Team has been around since 1981, when Congress passed legislation allowing NRCS to use volunteers in all programs. Congress passed legislation – Section 1526 of PL97-98, Food and Agriculture Act – in 1981 permitting the Natural Resources Conservation Service (NRCS) to use volunteers. In 1985, the volunteer effort was organized as the Earth Team, primarily due to the Farm Bill and the increased workload of NRCS. The primary purpose of the Earth Team is to expand NRCS services by using volunteer time, talent and energy to help accomplish the NRCS mission. The Earth Team Volunteers application tracks volunteer hours and proper names.

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 track volunteer hours.

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?

No process in place at this time. Solely reliant on volunteer to keep information updated.

**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.)?

NRCS/Earth Team

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

Restricted by Earth Team by using eAuthentication with a double layer identifier plus password.

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

Yes  
 No

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

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/Earth Team

**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.)?

By proper name to track volunteer hours.

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))

Notice of Privacy Act System of Records by Owner, Operator or Producer Files (or Volunteer / Employee Files) USDA/NRCS-1

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

The system is not being modified.

## 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:

USDA PRIVACY IMPACT ASSESSMENT FORM

**1. Yes.**

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

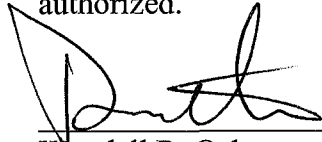
## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Earth Team Volunteers

This document has been completed in accordance with the requirements of the EGovernment Act of 2002.

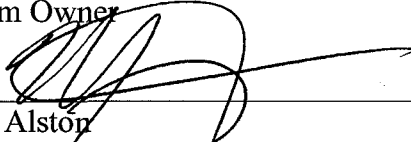
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.



Wendall R. Oaks  
System Owner

5-16-08

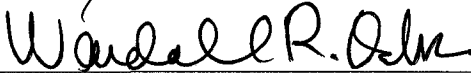
Date



Mary Alston  
NRCS FOIA/PA Officer

4-29-08

Date



Jack Carlson  
NRCS CIO

5-16-08

Date