



# **Privacy Impact Assessment**

## **Laboratory Information Management System (LIMS)**

*Revision: 1.0*

*Natural Resources  
Conservation Service*

*Date: June 2007*

**USDA PRIVACY IMPACT ASSESSMENT FORM**

**Agency:** Natural Resources Conservation Service

**System Name:** Laboratory Information Management System (LIMS)

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

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

**Description of the System:**

The Laboratory Information Management System (LIMS) assists with managing lab data distributed directly to a variety of internal and external users. Data from LIMS are also exported to NASIS for eventual distribution to internal and external users as part of a comprehensive set of soil survey data.

**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.

**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.**

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 “Person Table” in our Laboratory Information Management System(LIMS) consist of user names, business contact address including telephone number and email address. The above information is used to aid, assist and identify users and ownership of laboratory database information.

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 the data are relevant, we need to know who, it is convenient to have contact information

No, we are not required by statute to maintain the info

5. Sources of the data in the system.

5.1. What data is being collected from the customer?

Name, business contact address including telephone number and e-mail address.

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

Published USDA personnel databases are used to populate LIMS Person Table.

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

State Universities and Natural Resources Agencies

5.4. From what other third party sources is data being collected?

Cooperators in the National Cooperative Soil Survey

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?

By personal communication or web sites

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

We use established public personnel database information to update our LIMS Person Database Table.

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

By personal communication

## 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?

We use only public available database information. Principal use of this data is identifying who is involved in collection, use, dissemination of the laboratory soil data for custodial and communication purposes.

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

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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?

We use only currently public published data in our database Person Table.

**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?

Original data is historical. Addresses may be updated from public published records if found to be needed and are out of date.

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?

Ye)  
 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.)

All users have limited access

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

Data are accessed through controlled forms.

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

Yes



No

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

Password protection. Only accessory data to laboratory soil data is available.

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.)?

All database information is stored on servers and under the control of NRCS CIO chain of command.

**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.)?

Database Table Key

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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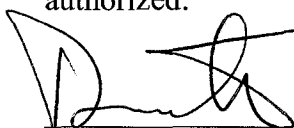
## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Laboratory Information Management System(LIMS) and It's Public Data Sharing  
File System.

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

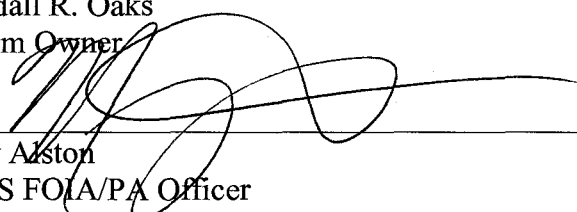
We fully accept the changes as needed improvements and authorize initiation of work to  
proceed. Based on our authority and judgment, the continued operation of this system is  
authorized.



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