



# **Privacy Impact Assessment**

OAFS

*Revision: 1.0*

*USDA OCIO NITC*

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## Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	411512010	Larry Beckett	

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## System Information

System Information	
Agency:	USDA-OCIO-NITC
System Name:	Enterprise Information Management System (ELMS)
System Type:	<input type="checkbox"/> Major Application <input type="checkbox"/> CI General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input type="checkbox"/> El Moderate <input type="checkbox"/> Low
Description of System:	<p>The EIMS is a USDA enterprise service using the Microsoft Identity Integration Server (MIIS) application to coordinate shared user identity data for the 29 Agencies within the USDA. The EMS solution addresses the business needs, difficulties, and legacy practices that do not meet HSPD-12 and USDA CIO requirements.</p>
Who owns this system? (Name, agency, contact information)	<p>James Steven            USDA-OCIO-NITC            8930 Ward Parkway            Kansas City, MO 64114            816-926-2335  <a href="mailto:james.steven@usda.gov">james.steven@usda.gov</a></p>
Who is the security contact for this system? (Name, agency, contact information)	<p>Greg Schmitz            USDA-OCIO-NITC            8930 Ward Parkway            Kansas City, MO 64114            816-926-2356  <a href="mailto:greg.schmitz@ocio.usda.gov">greg.schmitz@ocio.usda.gov</a></p>
Who completed this document? (Name, agency, contact information)	<p>Larry Beckett            USDA-OCIO-NITC            301 S Howes            Fort Collins, CO 80521            970-295-5356  <a href="mailto:lawrence.beckett@ftc.usda.gov">lawrence.beckett@ftc.usda.gov</a></p>

## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system,	EIMS is a synchronization service that acts as a gateway between connected resources for identity-related data.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No — If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	N/A — The system does not collect Social Security Numbers (SSN's) or Taxpayer Identification Numbers (TIN's)
3	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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	Information is collected from Federal and contracted workers and visitors.
4.1	What data is being collected from the customer?	Information is not collected from customers.
4.2	What USDA agencies are providing data for use in the system?	USDA agencies do not provide data for use in the system.
4.3	What state and local agencies are providing data for use in the system?	State and local agencies do not provide data for use in the system.
4,4	From what other third party sources is data being collected?	Information is not collected from third party sources.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No — If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	N/A — data is not collected from customers, only Federal and contracted workers as well as visitors.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A — data is not collected from USDA Agencies, only Federal and contracted workers as well as visitors.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A — data is not collected from non-USDA sources or any other third party sources.

## 2.2 Data Use

No.	Question	Response
6	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?	EIMS was developed and placed into production to provide a fast, but carefully controlled data interface between disparate systems for HR, authentication, email, physical facilities, and other purposes. Interfaces, called "connectors," allow for controlled data element flow together with some format conversion services between systems.
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes E No - If NO, go to question 8.
7.1	What are the other purposes?	N1A - Data will not be used for any other purpose other than facility access.
8	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	E1 Yes • No
9	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.)?	<input type="checkbox"/> Yes E1 No - If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	N/A - no new data will be derived
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	N/A - no new data will be derived
9.3	How will the new data be verified for relevance and accuracy?	N/A - no new data will be derived
10	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?	EIMS provides a fast, but carefully controlled data interface between disparate systems for HR, authentication, email, physical facilities, and other purposes. Interfaces, called "connectors," allow for controlled data element flow together with some format conversion services between systems.
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes I No - If NO, go to question 12.
11.1	What are the other uses?	N/A - data will have no other use.

No.	Question	Response
12	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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No — If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	N/A — Data is not being consolidated.
13	Are processes being consolidated?	111 Yes <input type="checkbox"/> No — If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	N/A

## 2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<ul style="list-style-type: none"> <li>• Yes</li> <li><input type="checkbox"/> No — If NO, go to question 15.</li> </ul>
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	EIMS is not a data repository and does not retain data.
14.2	What are the procedures for purging the data at the end of the retention period?	N/A - EIMS is not a data repository per se and does not retain data.
14.3	Where are these procedures documented?	N/A
15	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?	N/A
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	17) Yes <input type="checkbox"/> No

## 2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	0 Yes <ul style="list-style-type: none"> <li>• No - If NO, go to question 18.</li> </ul>

No.	Question	Response
17.1	How will the data be used by the other agency?	Identity data from EmpowHR and PP are synchronized and distributed to authorized connected systems.
17.2	Who is responsible for assuring the other agency properly uses the data?	The system owner.
18	Is the data transmitted to another agency or an independent site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No — If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PIP and/or Privacy Act data is appropriately protected?	N/A — Data will not be transmitted.
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No — If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	N/A — System is in one site.

## 2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Physical security staff, guards and system administrators.
21	How will user access to the data be determined?	There are no users outside the security staff, guards and system administrators.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22	How will user access to the data be restricted?	This system is in a restricted environment. The database is only accessible on restricted computers within restricted access areas. User ID and Password is required to gain access to data on this stand-alone network.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes — User ID and password is required to log into the system. <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The system resides on a stand-alone network and uses authentication to access the interface and database.



## 2.6 Customer Protection

No.	Question	Response
24	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.)?	Security staff and guards are responsible for the physical security of the data. This system's interface is only accessible via a stand-alone network to the above group of staff.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	They can contact the Chief, Security Staff NITC.
26	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?	<input checked="" type="checkbox"/> Yes — If YES, go to question 27. <input type="checkbox"/> No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	NIA— a "breach" policy is in place.
27	Consider the following: <ul style="list-style-type: none"> <li>• Consolidation and linkage of files and systems</li> <li>• Derivation of data</li> <li>• Accelerated information processing and decision making</li> <li>• Use of new technologies</li> </ul> Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes 4 No — If NO, go to question 28.
27.1	Explain how this will be mitigated?	N/A
28	How will the system and its use ensure equitable treatment of customers?	Customers are not allowed to have access to this system. This system is in a restricted environment. The database is only accessible on restricted computers within restricted access areas.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes EII No — If NO, go to question 30
29.1	Explain	EIMS is a synchronization service that acts as a gateway between connected resources for identity-related data. It does not affect the data in any way.

## 3 System of Record

No.	Question	Response
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No.	Question	Response
30	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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No — If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Unique attributes are specified for each connecting system.
30.2	Under which Systems of Record (SOR) notice does the system operate?	EIMS does not gather public information. No SOR is required.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No — If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	N/A

## 5 Completion Instructions

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 Sc (Is there at least one Privacy Impact Assessment (PIA) which covers this system?) is Yes.

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

## Privacy impact Assessment Authorization

### Memorandum

I have carefully assessed the Privacy Impact Assessment for the

Enterprise Identity Management Service

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

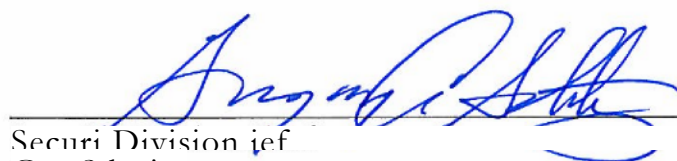
We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.



System Manager/Owner  
James Steven

4/15/10

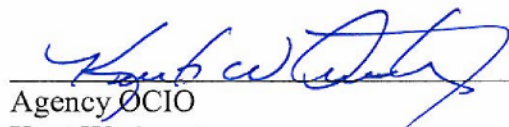
Date



Securi Division ief  
Greg Schmitz

4/16/2010

Date



Agency OCIO  
Kent W. Armstrong

cli/24,9rd

Date