



United States
Department of
Agriculture

Farm Service Agency
FSA/DAM/ITSD/GIEMSC/EMSO
1400 Independence Avenue, SW
Washington, DC 20250

Privacy Impact Assessment (PIA)

Visual Powerfiles for EEO (VPEEO)

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Document Information

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Final V.1	08/29/2008	R. Grant-Smith, ECS	Per Sue Bussells' recommendation, made changes to section 2.5.
Final V.2	9/4/2008	R. Grant-Smith, ECS	Per S. Nuessle's recommendation, made changes to the signature page swapping Karen Malkin, CPO, with Brian Davies, ISSPM.

Distribution List			
Name	Title	Agency/Office	Contact Information



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1 Purpose of Document

USDA DM 3515-002 states: "Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner's requirements presents any threats to privacy."

The Privacy Impact Assessment (PIA) document contains information on how the Visual Powerfiles for EEO (VP EEO) affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.



2 Applicability

2.1 Applicability of System

The information in this document is applicable to the Visual Powerfiles for EEO (VPEEO).

2.2 System Overview

Visual Powerfiles™ for EEO is a total information management and reporting system for the Federal Equal Employment Opportunity (EEO) Program functions. It includes the following modules:

- **Affirmative Employment Reporting:** which includes reports, narrative analyses, and graphics describing
 1. All MD 715 Tables;
 2. Applicant Tracking under MD 715;
 3. The distribution (numbers and percentages) of employees by Race/National Origin and Gender (RNO/Gender) and Handicapping Condition within various employment categories;
 4. Comparisons showing the distribution (numbers and percentages) of employees by Race/National Origin and Gender and Handicapping Condition within various employment categories over time periods;
 5. Civilian Labor Force (CLF) comparisons for various employment categories;
 6. The distribution (numbers and percentages) of employees by RNO/Gender and Handicapping Condition of Accessions, Promotions, Separations, Down-Grades, Reassignments, and Conversions; and
 7. The distribution (numbers and percentages) of employees by RNO/Gender and Handicapping Condition of Training, Awards, Disciplinary Actions, Special Assignments, and Details.
- **Multi-Year Affirmative Action Plan Development and Annual Accomplishment Reporting System:** which includes full analysis and planning document development with dates and timetables. Action tracking through the Agency email system permits EEO project tracking and plan review and analysis.
- **Ad Hoc Analysis:** which permits the querying of onboard personnel snapshot extract files, personnel action files, applicant flow files, and complaint files.
- **Advanced Statistical Analysis Summaries:** which includes calculations of Mean, Medium, Mode, Quartiles, Percentiles, Range, Variance, Standard Deviation, Z-Scores, t-test, Chi-Squared, various forms of Regression Analyses and other statistical analysis and probability techniques appropriate for analyzing workforce data.
- **EEO Complaint Tracking System:** which enables the user to track every step, event, date, item, or individual involved in the processing of EEO complaints.



2.3 System Categorization

By following the guidance set forth in NIST SP 800-60 and FIPS PUB 199 taking into account the information types and other factors for this system, the Security Categorization for this system has been determined to be **Moderate**. Therefore, Risk Assessments and Security Testing and Evaluation (ST&E) will be performed following the Moderate baseline set forth in NIST SP 800-53 Annex 2.

2.4 Responsible Organization

United States Department of Agriculture (USDA)
Farm Service Agency (FSA)
1400 Independence Avenue SW
Washington, D.C. 20250

2.5 Information Contacts

- **Certification Agent**

Sue E. Bussells
FSA Chief Information Officer (Acting)
Director, Information Technology Services Division (ITSD) (Acting)
FSA/DAM/ITSD
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Farm Service Agency
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- **Authorizing Official (Designated Approval Authority - DAA)**

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Associate Administrator for Operations and Management
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U.S. Department of Agriculture
Farm Service Agency
1400 Independence Avenue SW
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- **User Representative**

Andrew Malloy
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- **Information Owner**

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- **Information System Owner**

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1400 Independence Ave., SW, Suite 6637
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(202) 690-1146
dewayne.brown@wdc.usda.gov

2.6 Assignment of Security Responsibility

- **Privacy Act Officer**

Karen Malkin
Chief Privacy Act Officer
USDA/FSA/OA
U.S. Department of Agriculture
Farm Service Agency
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- **Freedom of Information Act (FOIA) Coordinator**

Thomas B. Hofeller, Acting
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- **Information System Security Program Manager**

Brian Davies



Information System Security Program Manager (ISSPM)
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- **Certification & Accreditation Coordinator**

Georgia "Shelly" Nuessle
Certification & Accreditation Coordinator
Information Security Office (ISO)
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2.7 Who Completed this Assessment?

DeWayne Brown
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3 USDA Privacy Impact Assessment

3.1 Does the System Contain Information About Individuals in an Identifiable Form?

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

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

¹ 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.



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.



3.1.1 Data Collection

1. Generally describe the data to be used in the system.

Data used in the VPEEO system is Employee or Employee-Applicant related.

2. 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

Sources of the data in the system.

- 2.1. What data is being collected from the customer?

The National Finance Center's PayPers System, EEO Complaint Data is entered into the system manually by Staff Members of the Office of Civil Rights and Farm Service Agency.

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

Farm Service Agency

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

None

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

None

3. 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 section 3.1.2, question 1.

- 3.1. How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?

Data collected directly from Employees is EEO Complaint data.
Data provided by PayPers data is SF50 Data and Payroll data, including SSN, RNO, and Handicapping Condition and other employee data.

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



Data input into the system by EEO Counselors and Specialists is verified by Staff Members, OCR, FSA.

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

All Data is checked for completeness by Staff Members, OCR, FSA, and Software Developer/Vendor staff using report output.

3.1.2 Data Use

1 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?

Data used in the VPEEO system is Employee or Employee-Applicant related

2 Will the data be used for any other purpose?

- Yes
- No. If NO, go to question 3 (below).

2.1 What are the other purposes?
N/A

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.

- Yes
- No

4 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 5 (below).

4.1 Will the new data be placed in the individual's record (customer or employee)?

- Yes
- No

4.2 Can the system make determinations about customers or employees that would not be possible without the new data?

- Yes
- No



4.3 How will the new data be verified for relevance and accuracy?

Data input into the system by EEO Counselors and Specialists is verified by Staff Members, OCR, and FSA.

5 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?
Analysis and reporting

6 Will the data be used for any other uses (routine or otherwise)?

- Yes
- No. If NO, go to question 7 (below).

6.1 What are the other uses?

7 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 8 (below).

7.1 What controls are in place to protect the data and prevent unauthorized access?

8 Are processes being consolidated?

- Yes
- No. If NO, go to section 3.1.3, question 1.

8.1 What controls are in place to protect the data and prevent unauthorized access?

3.1.3 Data Retention

1 Is the data periodically purged from the system?

- Yes
- No. If NO, go to question 2 (below).

1.1 How long is the data retained whether it is on paper, electronically, in the system or in a backup?



EEO Complaint Cases may be deleted by the OCR System Administrator once it has been verified the case(s) has (have) indeed been closed for 5 years using a process script.

1.2 What are the procedures for purging the data at the end of the retention period?

Process Script

1.3 Where are these procedures documented?

TBD

2 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?

EEO Complaint Cases may be deleted by the OCR System Administrator once it has been verified the case(s) has (have) indeed been closed for 5 years. As well as monthly employee data uploads from NFC.

3 Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

- Yes
- No

3.1.4 Data Sharing

1 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 2 (below).

1.1 How will the data be used by the other agency?

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

2 Is the data transmitted to another agency or an independent site?

- Yes
- No. If NO, go to question 3 (below).

2.1 Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

3 Is the system operated in more than one site?



- Yes
- No. If NO, go to section 3.1.5, question 1.

3.1 How will consistent use of the system and data be maintained in all sites?

3.1.5 Data Access

1 Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?

Users (Staff Members OCR and HRD, FSA), Managers, System Administrators, Software Developers/Vendor

2 How will user access to the data be determined?

The utmost privacy requirements must be maintained. VP EEO is designed to provide the highest level of security possible for privacy act data. Users must be authenticated at multiple levels prior to being given access to the database. Specifically they must:

1. be authorized on the network domain
2. be authorized on the SQL-Server
3. be authorized on the VP EEO system
4. be authorized to access data specific to their mission and function

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

- Yes
- No

3 How will user access to the data be restricted?

- FSA Office of Civil Rights (OCR) staff at headquarters that have EEO complaint responsibilities will have access to all data in the System.
- FSA OCR Staff with no EEO complaint responsibilities will only have access to Affirmative Employment Data.
- FSA OCR Staff in the Regions and FSA OCR staff at headquarters that have EEO complaint responsibilities will have access to all data in the system pertaining to their region.
- FSA OCR Staff in the Regions with no EEO complaint responsibilities will only have access to Affirmative Employment Data pertaining to their region.
- Human Resources Division (HRD), FSA staff at headquarters with no EEO complaint responsibilities will only have access to Affirmative Employment Data.
- HRD, FSA staff at headquarters with EEO complaint responsibilities will have access to EEO complaints assigned to them.
- OCR, FSA Staff in Kansas City will have access to EEO Complaint Data and Affirmative Employment Data per recommendation of the Kansas City EEO/CR Staff Officer.



- HRD, FSA Staff in Kansas City will have access to Affirmative Employment Data per recommendation of HRD Director.

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

- Yes
- No

4 Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

- Yes
- No

3.1.6 Customer Protection

1 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.)?

OCR, FSA VPEEO Administrator assigned by Director, OCR, FSA.

2 How can customers and employees contact the office or person responsible for protecting their privacy rights?

Email and/or phone

3 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 4 (below).
- No

3.1 If NO, please enter the POAM number with the estimated completion date:

4 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 5 (below).

4.1 Explain how this will be mitigated?



5 How will the system and its use ensure equitable treatment of customers?

N/A

6 Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

- Yes
- No. If NO, go to section 3.1.7, question 1.

6.1 Explain

3.1.7 System of Record

1 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 section 3.1.8, question 1.

1.1 How will the data be retrieved? In other words, what is the identifying attribute (i.e. employee number, social security number, etc.)?

1.2 Under which Systems of Record notice (SOR) does the system operate? Provide number, name and publication date. (SORs can be viewed at <http://www.upoaccess.gov/privacyact/index.html>. Copy "USDA/FSA:" into the search box.

USDA/FSA-07 Employee Resources Master File
 USDA/FSA-08 EEO Advisory Committee and Counselors,
 USDA/FSA-09 Complaints and Discrimination Investigation Handled by the EEO Staff

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

3.1.8 Technology

1 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.

1.1 How does the use of this technology affect customer privacy?



Privacy Impact Assessment for Visual Powerfiles for EEO

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



4 Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the
Visual Powerfiles for EEO (VPEEO)

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.

Frank Wesolowski

Frank Wesolowski
Information Owner

8/28/08

Date

Sue Bussells

Sue Bussells
Agency CIO (Acting)

8-28-08

Date

Brian Davies

Brian Davies
Information System Security Program Manager (ISSPM)

9/8/2008

Date