



Privacy Impact Assessment

FSA Compliance

Revision: 1.0

*Natural Resources Conservation
Service*

Date: November 2009



Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	25 Nov 09	Ray Coleman	Initial Draft

Distribution List			
Name	Title	Agency/Office	Contact Information



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1 System Information

System Information	
Agency:	Natural Resources Conservation Service
System Name:	FSA Compliance
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	FSA Compliance Reviews is an historical application used to sample a subset of tract systems from around the country to ensure compliance reviews are conducted of farms receiving commodity payments and are implementing and/or maintaining conservation practices. Status reviews are conducted on highly erodible (HEL) and wetlands (WET) designated farm tracts.
Who owns this system? (Name, agency, contact information)	Frank Geter, Development Branch Chief, USDA-NRCS, Frank.Geter@ftc.usda.gov , (970) 295-5540
Who is the Government Project Manager for this system? (Name, agency, contact information)	Ken Tootle, Application Government Project Manager, USDA-NRCS, Ken.Tootle@ftc.usda.gov , (817) 509-3299
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 , (970) 295-5550
Who completed this document? (Name, agency, contact information)	Ray Coleman, Systems Security Analyst, USDA NRCS Contractor, ray.coleman@ftc.usda.gov , 970-2955-5570

2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p><u>Categories of Data:</u></p> <ul style="list-style-type: none"> • Public • Natural Resource Data <ul style="list-style-type: none"> ○ Conservation Practice Data • Personal Information is provided through the SCIMS interface (race, sex, national origin, tax ID, contact information) <p>Note: Personal information is not stored within the application DB, but aggregates PII with in the application user interface.</p> <p><u>Categories of Users:</u></p> <ul style="list-style-type: none"> • NRCS Employees • Affiliates – (i.e., Contractors, TSP, District Conservationist (DC), etc...) • Various State Government agencies
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



No.	Question	Response
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.	<ul style="list-style-type: none">• Natural Resources Conservation Service (NRCS),• Forest Service Agency (FSA) (SCIMS)• National Agriculture Statistic (NAS)
4.1	What data is being collected from the customer?	N/A, data is not collected from customers
4.2	What USDA agencies are providing data for use in the system?	<ul style="list-style-type: none">• NRCS• FSA• NAS
4.3	What state and local agencies are providing data for use in the system?	Various State and Local Government agencies provide data for use with in FSA COMPLIANCE to facilitate conservation planning, tracking and reimbursement measures.
4.4	From what other third party sources is data being collected?	N/A, no data is being 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6. FSA, NAS, State and local Government agencies

No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	<ul style="list-style-type: none"> • The majority of FSA COMPLIANCE data collected is validated and verified by the field office employees and their respective quality assurance contacts above them at the area and state office levels. • Data collected for use within FSA COMPLIANCE is verified by AIMS Business analysis team members and National AIMS team members.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	<ul style="list-style-type: none"> • The majority of FSA COMPLIANCE data collected is validated and verified by the field office employees and their respective quality assurance contacts above them at the area and state office levels. • Data collected for use within FSA COMPLIANCE is verified by AIMS Business analysis team members and National AIMS team members.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	<ul style="list-style-type: none"> • Data input into FSA COMPLIANCE for State and Local programs is validated and verified by the NRCS and Non-NRCS field office employees and their respective quality assurance contacts above them at the area and state office levels. • Data collected for use within FSA COMPLIANCE is verified by AIMS Business analysis team members and National AIMS team members



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?	<ul style="list-style-type: none"> • Conservation Planning • Conservation Delivery
7	Will the data be used for any other purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	N/A
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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 10. FSA COMPLIANCE has multiple sources when combined could allow users to derive new data previously unavailable about individuals through aggregation
9.1	Will the new data be placed in the individual’s record (customer or employee)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



No.	Question	Response
9.3	How will the new data be verified for relevance and accuracy?	<ul style="list-style-type: none"> • The majority of FSA COMPLIANCE data collected is validated and verified by the field office employees and their respective quality assurance contacts above them at the area and state office levels. • Data collected for use within FSA COMPLIANCE is verified by AIMS Business analysis team members and National AIMS team members.
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?	N/A, data with-in FSA COMPLIANCE is not collected from individuals
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	N/A
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	<ul style="list-style-type: none"> • Role Based Access Control • eAuth Level II Authentication • IAS Roles Authorization
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Data, with in FSA COMPLIANCE is retained indefinitely for Historical purposes
14.2	What are the procedures for purging the data at the end of the retention period?	N/A, Data, with in FSA COMPLIANCE is retained indefinitely for Historical purposes
14.3	Where are these procedures documented?	N/A, Data, with in FSA COMPLIANCE is retained indefinitely for Historical purposes
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?	<ul style="list-style-type: none"> • The majority of FSA COMPLIANCE data collected is validated and verified by the field office employees and their respective quality assurance contacts above them at the area and state office levels. • Data collected for use within FSA COMPLIANCE is verified by AIMS Business analysis team members and National AIMS team members.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> 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.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	Other agencies will have access to high level “PUBLIC” information (reports)
17.2	Who is responsible for assuring the other agency properly uses the data?	NRCS, National FSA COMPLIANCE Coordinator
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	N/A
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

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.)?	<ul style="list-style-type: none"> • FSA COMPLIANCE Reports – High level summary report are made publicly available to all users. • DB Access – Is restricted to a limited number of operational personnel that support the application and its components in production.
21	How will user access to the data be determined?	<p>Access to FSA COMPLIANCE is determined based on a valid need-to-know, which will be determined by assigned official duties, personnel security criteria; and intended system usage</p> <p>NOTE#: Public information is available to all users</p>
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	<ul style="list-style-type: none"> • Role Based Access Control • eAuth Level II Authentication • IAS Roles Authorization
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <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

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.)?	NRCS, National FSA COMPLIANCE Coordinator
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	<p>If incident response assistance is needed Customers and employees can contact the NRCS Security Response Team via the following numbers:</p> <ul style="list-style-type: none"> • Lost and Stolen equipment NRCS 800 number (1-888-926-2373) and/or e-mail address (nrcs.security@usda.gov). • Personal Identifiable Incidents – 877-744-2968 (PII-2YOU) • NRCS/CD - (202) 757-8111 or (703) 200-3008 <p>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. Furthermore, NRCS leverages incident response assistance from the USDA Cyber Security. The USDA Cyber Security provides an incident response support resource that offers advice and assistance to users of the information system for the handling and reporting of security incidents. The support resource is an integral part of the organization’s incident response capability.</p>



No.	Question	Response
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.	N/A
27	Consider the following: <ul style="list-style-type: none">▪ 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	N/A
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	N/A

3 System of Record

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.)?	<ul style="list-style-type: none"> • Customer Name • Plan Name
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov .)	Notice of Privacy Act System of Records by Owner, Operator or Producer Files (or Volunteer / Employee Files) USDA/NRCS-1. http://www.nrcs.usda.gov/about/foia/408_45.html .
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input 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?	



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 8c is:

1. 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

(System Name)

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
OR Project Representative
OR Program/Office Head.

Date

Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

Date

Agency OCIO

Date