

Privacy Impact Assessment for Client Services (CS) System

International Technology Services (ITS)

- Version: 1.0
- Date: April 16, 2012
- Prepared by: International Technology Services (ITS)
Governance Services Division (GSD)
Security Compliance Services Branch (SCSB)





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April nn, 2012

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Abstract

This Privacy Impact Assessment (PIA) supports the International Technology Services (ITS) Client Services (CS) system. The ITS CS system is used by ITS and the Service Center Agency's (SCA) Federal employees, contractors, and partners for ongoing desktop computing needs. This PIA is being completed due to a Privacy Threshold Analysis (PTA) that indicated a PIA was required for the CS system to meet Federal privacy compliance requirements.

Overview

The ITS CS system is used by ITS and the Service Center Agency's (SCA) Federal employees, contractors, and partners for ongoing desktop computing needs. CS also encompasses the system that ITS utilizes to provide legacy services to customers. Major components of the CS system include the following:

- Enterprise Messaging System, made up by:
 - Microsoft Exchange Server 2007 (Exchange)
 - Microsoft Office SharePoint Server (MOSS)
 - Microsoft Office Communications Server (OCS)
- Windows Active Directory (future replacement with Enterprise Active Directory)
- Blackberry Enterprise Server 4.1.4

The CS architecture utilizes the Microsoft Windows Active Directory (AD) system for authorization and authentication services, on which this PIA is focused. This AD instantiation comprises a forest of five domains: One (root domain, no users supported), AgEast, AgCentral, AgWest, and AgLO.

AgLO comprises the nine USDA-designated large offices: USDA National Headquarters; Carver Center in Beltsville, MD (NRCS staff and Infrastructure Deployment Branch/IO Lab); National Resources Conservation Service (NRCS) IT Center in Fort Collins, Colorado; the Farm Service Agency (FSA) IT Center in Kansas City, Missouri; and the Rural Development (RD) IT Center in St. Louis, Missouri. The remaining large offices are specialty centers such as the National Soils Laboratory in Lincoln, Nebraska; the National Climate Data Center in Portland, Oregon; the National Geospatial Data Center in Fort Worth, Texas; the Aerial Photography Field Office in Salt Lake City, Utah; and the National Technical Support Center in Greensboro, North Carolina. The CS devices in the large offices consist of servers in the



IT Center and all assigned desktops and laptops. The CS devices do not include the networking equipment that provides connectivity to the Universal Telecommunications Network (UTN), the USDA backbone, or the Internet.

Additionally, there are approximately 2,800 state and county offices run by the SCAs throughout the United States and its territories. Typically, one of these offices consists of several servers along with desktop and laptop computers for the SCA staff assigned to that office. These SCA offices are assigned to one of the other three AD domains (AgEast, AgCentral, or AgWest) depending on the geographic location of the office. The CS devices do not include the networking equipment that provides connectivity to the UTN, the USDA backbone, or the Internet.

Section 1.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

1.1 What information is collected, used, disseminated, or maintained in the system?

The information that is collected, used, disseminated, or maintained in the ITS CS system is used by the Microsoft Active Directory (AD) component for user identification, authorization, and authentication purposes and includes the user's name, organizational unit information, office telephone number, electronic mail address, and physical office address.

1.2 What are the sources of the information in the system?

The source of the information used is the System Access Authorization Request (SAAR) process.

1.3 Why is the information being collected, used, disseminated, or maintained?

The information is collected and used to provide ITS and SCA Federal employees, contractors, and other authorized CS system user's AD credentials for the authorized use of the system, ITS and SCA applications, and components.

1.4 How is the information collected?

Information collected for use in the system is derived from the System Access Authorization Request (SAAR) process.

1.5 How will the information be checked for accuracy?

The authorized Federal or contractor personnel that input the data from the SAAR documentation are responsible for checking the information for accuracy when they develop a new user account. Further, AD does check the information that is input to ensure that it is in the proper format for use within the component. The information that is input from the SAAR form is supplied by the person requesting that a user account be added to or that a user account is changed/updated in AD and is assumed to be the authoritative source of that information.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

Both Office of Management and Budget (OMB) Circular A-130, Appendix II and the Federal Information Security Management Act of 2002 (FISMA) (Title III, Pub. L. No. 107-347) require that all users of a system be uniquely identified to be able to use a Federal information system. Microsoft Active Directory (AD), a critical component of the ITS CS system, implements this requirement by using the individual's name as part of the unique identification process.

1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

No other personal information besides the individual's name is used within the CS system and only authorization information is shared with other systems and applications. Risks associated with data collection in the CS are minimal and include the possibility of the data being accessed by unauthorized personnel. Furthermore, additional risks to the system data are mitigated through the use of regular system scans, testing, and reviews.

Section 2.0 Uses of the Information

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

The information that is collected, used, disseminated, or maintained in the ITS CS system is utilized by the Microsoft Active Directory (AD) component for user identification, authorization, and authentication purposes.

2.2 What types of tools are used to analyze data and what type of data may be produced?

Custom scripts are used to gather account information. This information is processed and formatted to produce access control reports. These reports are produced on a monthly, quarterly, and annual basis for review and approval by the responsible parties.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

The ITS CS system does not use commercial or publicly available data.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

The Microsoft AD component does not share the person's name with other systems or applications. Only the information on a specific user's authorization to use a given system or application is shared to ensure that the system or application is only accessed by authorized users. Because of this control of shared information, the risk to an individual's privacy is considered to be very low.

Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 How long is information retained?

Microsoft AD information is only maintained for the duration of time that an individual is a Federal employee, contractor, or other partner requiring access to the CS and for the National Archives and Records Administration (NARA) required retention period for computer operational records.

3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

No, records retention requirements for this system have not specifically been approved by NARA.

3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Risks associated with data retention for the CS are minimal and include the possibility of the data being accessed by unauthorized personnel. Additionally, risks associated with the length of time the data is retained are mitigated through the use of regular system scans, testing, and reviews.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

The information gathered for the creation of accounts within the CS system is shared with the user's agency security office where it is distributed for review and approval by the appropriated parties.

4.2 How is the information transmitted or disclosed?

Reports on account information are posted to an SSL encrypted Sharepoint site. Access to the site is restricted to appropriate parties.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Risks associated with data sharing outside the CS are minimal and include the possibility of the data being accessed by unauthorized personnel. Risks associated with data sharing are mitigated through the use of regular system scans, testing, and reviews.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

Microsoft AD information is not shared outside the USDA.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it

covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

Microsoft AD information is not shared outside the USDA.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

Microsoft AD information is not shared outside the USDA.

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Microsoft AD information is not shared outside the USDA; therefore the risk to an individual's privacy is minimal. However, all risks to the system data are mitigated through the use of regular system scans, testing, and reviews.

Section 6.0 Notice

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

6.1 Was notice provided to the individual prior to collection of information?

Yes, all users are made aware during the SAAR process that their name will be used as part of the user identification for their access to the CS, its components, and other applications and systems.

6.2 Do individuals have the opportunity and/or right to decline to provide information?

No, the individual's name is required for their inclusion as an authorized user within the Microsoft AD component of the CS so that they may perform the tasks of their assigned job. Only authorized Federal employees, contractors, and other partners that require access to the CS are asked for this information.

6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

The only use of the name within the Microsoft AD component is to determine whether an individual is an authorized user of the CS and associated applications and systems.

6.4 Privacy Impact Analysis: Describe how notice is provided to individuals and how the risks associated with individuals being unaware of the collection are mitigated.

To mitigate risks associated with individuals being unaware of the data collection, all users are made aware during the SAAR process that their name will be used as part of the user identification for their access to the CS, its components, and other applications and systems. Additional risks to the system data are mitigated through the use of regular system scans, testing, and reviews.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 What are the procedures that allow individuals to gain access to their information?

Once the information for an individual is input into Microsoft AD using the SAAR form it is not changed. The individual only has access to the information as a user of AD. Other than the authentication credentials (i.e., password), which are changed on a regular basis in AD, only a system administrator can change the information for an individual.

7.2 What are the procedures for correcting inaccurate or erroneous information?

A SAAR must be produced to initiate a change to the information contained in the Microsoft AD.

7.3 How are individuals notified of the procedures for correcting their information?

During initial training for the system, users are instructed to contact their Information System Security Point of Contact (ISSPOC) to utilize the SAAR process to make any updates to their account information. If an individual subsequently needs to update their account information, they contact their ISSPOC to input a SAAR in the Remedy tool detailing what needs to be updated. As updates are made, the information on account maintenance is delivered via email or web site to the user's agency

Information Security Support Staff (ISSS) office. This information is then forwarded via email through the management chain to the user.

7.4 If no formal redress is provided, what alternatives are available to the individual?

Formal redress is provided through the SAAR process.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

All users are made aware during the SAAR process that their name will be used as part of the user identification for their access to the CS, its components, and other applications and systems. Additionally, Microsoft AD information is not shared outside the USDA; therefore the risk to an individual's privacy is minimal. However, additional risks to the system data are mitigated through the use of regular system scans, testing, and reviews.

Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system and are they documented?

All users of the ITS CS must be Federal ITS or SCA employees, contractors, or authorized partners of the USDA and must complete a background investigation and the SAAR process prior to being given access to the system. The process for determining which users may access the system is documented in the hiring and SAAR process documents.

8.2 Will Department contractors have access to the system?

Yes, and they must have a current contract with ITS or the SCAs to have and maintain that access.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

All ITS and SCA Federal, contractor, and authorized partner users received initial security and privacy training prior to being given access to the CS and annually thereafter as long as they work for ITS or the SCAs.

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

Yes and the security authorization process (formerly known as Certification and Accreditation) is currently underway with a projected completion date in mid-April 2011 when the current authority to operate (ATO) expires.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

The ITS CS has an extensive list of audit parameters that are monitored on a regular basis including auditing of user account changes.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

Microsoft AD information is not shared outside the USDA; therefore the risk to an individual's privacy is minimal. Additionally, system security controls have been designed to limit sharing of data and to identify privacy risks on the system. Furthermore, risks to the system data are mitigated through the use of regular system scans, testing, and reviews.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

The ITS CS system is used by ITS, FAS, and the Service Center Agency's (SCA) Federal employees, contractors, and partners for ongoing desktop computing needs in support of the ITS and SCA's mission areas and includes hardware, software, connectivity, and miscellaneous networked devices.

9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

This application does not employ technology which may raise privacy concerns.

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?

Yes, the system owner and the ISSPM have reviewed the referenced OMB memoranda.

10.2 What is the specific purpose of the agency’s use of 3rd party websites and/or applications?

Not applicable, the ITS CS does not use third party websites or applications.

10.3 What personally identifiable information (PII) will become available through the agency’s use of 3rd party websites and/or applications.

Not applicable, since the ITS CS does not use third party websites or applications, no PII will become available through that use.

10.4 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be used?

Not applicable, the ITS CS does not use third party websites or applications.

10.5 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be maintained and secured?

Not applicable, the ITS CS does not use third party websites or applications.

10.6 Is the PII that becomes available through the agency’s use of 3rd party websites and/or applications purged periodically?

Not applicable, the ITS CS does not use third party websites or applications.

10.7 Who will have access to PII that becomes available through the agency’s use of 3rd party websites and/or applications?

Not applicable, the ITS CS does not use third party websites or applications.

10.8 With whom will the PII that becomes available through the agency's use of 3rd party websites and/or applications be shared - either internally or externally?

Not applicable, the ITS CS does not use third party websites or applications.

10.9 Will the activities involving the PII that becomes available through the agency's use of 3rd party websites and/or applications require either the creation or modification of a system of records notice (SORN)?

Not applicable, the ITS CS does not use third party websites or applications.

10.10 Does the system use web measurement and customization technology?

Not applicable, the ITS CS does not use third party websites or applications.

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

Not applicable, the ITS CS does not use third party websites or applications.

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

Microsoft AD information is not shared outside the USDA; therefore the risk to an individual's privacy is minimal. Additionally, potential risks to the system data are mitigated through the use of regular system scans, testing, and reviews.



Privacy Threshold Analysis
International Technology Services (ITS) Client Services (CS) System

Privacy Threshold Analysis Authorization Memorandum

The below signatures indicate that this Privacy Threshold Analysis for the **Client Services (CS) System** has been carefully reviewed for completeness and accuracy and has been completed in accordance with the requirements of the EGovernment Act of 2002 and the Privacy Act of 1974.

Phillip Rendina, System Owner

24 APRIL 12

Date

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