



# **Privacy Impact Assessment**

## **Customer Service Toolkit (CST)**

*Revision: 1.5*

*Natural Resources Conservation Service  
(NRCS)*

*Date: December, 2009*



## Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	12/3/2009	K. Hennings	Verify and transfer information into the new template
1.5	12/3/2009	K. Hennings	Changes per J. Brenner and T. Baugh

Distribution List			
Name	Title	Agency/Office	Contact Information

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# 1 System Information

System Information	
Agency:	USDA - NRCS
System Name:	Customer Service Toolkit (CST)
System Type:	<input type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input checked="" 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:	<p>Natural Resources Conservation Service (NRCS) has developed and implemented Customer Service Toolkits (CST) at the OCIO ITS Hosting Operations Branch (Web Farm) facility at Kansas City, MO to enable the agency to meet each initiative within the President's Management Agenda. The CST is a system of data collection tools, processes, and related applications that provide conservation information in a timely manner to support the agency's conservation program support activities. The CST is designed to collect high quality conservation information with minimal burden on the field, to ensure consistency nationwide in the data collected, and to make the information accessible to those who need it in a timely manner. The CST system includes: USDA Customer Service Toolkit 2004 (Toolkit), and Conservation Plug-in 2005 (Plug-in).</p>
Who owns this system? (Name, agency, contact information)	Kathy Green, Branch Chief – USDA – NRCS – ITC <a href="mailto:Kathy.Green@ftc.usda.gov">Kathy.Green@ftc.usda.gov</a> (970) 295-5647
Who is the Project Manager for this system? (Name, agency, contact information)	John Brenner, Project Manager – USDA – NRCS – ITC <a href="mailto:John.Brenner@ftc.usda.gov">John.Brenner@ftc.usda.gov</a> (970) 295-5616
Who is the security contact for this system? (Name, agency, contact information)	Chuck Hart, Information System Security Manager (ISSM) USDA – NRCS – ITC <a href="mailto:Chuck.Hart@ftc.usda.gov">Chuck.Hart@ftc.usda.gov</a> (970) 295-5550
Who completed this document? (Name, agency, contact information)	Kimberly Hennings, Systems Security Analyst USDA – NRCS – ITC (Contractor) <a href="mailto:Kim.Hennings@ftc.usda.gov">Kim.Hennings@ftc.usda.gov</a> (970) 295-5428

## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<u>Customer type</u> : General information that can identify the customer, provide means for contacting the customer, and basic demographic information for monitoring completeness of coverage in the delivery of agency conservation programs.
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
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.	Data is imported from the multi-agency Shared Customer Identity Database (SCIMS). It also utilizes information from the Conservation Management Guides (CMGs).
4.1	What data is being collected from the customer?	Data is not being collected from customers.
4.2	What USDA agencies are providing data for use in the system?	Conservation Districts and various State and Local agencies co-located with USDA service centers.
4.3	What state and local agencies are providing data for use in the system?	NRCS and Farm Service Agency (FSA).
4.4	From what other third party sources is data being collected?	None
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 being collected from customers.



No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data created by USDA and non-USDA staff about outside sources is reviewed for accuracy against existing agency data, and by the employees at local offices who have knowledge of the data. Toolkit does not have permissions for non-USDA staff data input. Plug-in has permissions for non-USDA staff data input. Data verification occurs through manual review, comparison with existing agency data, and by employees at local offices who have knowledge and responsibility of the data.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data is not collected from non-USDA 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?	<p>Since CST is accessible through eAuth, there isn't the "decline opportunity" or "notification of consent" to individuals prior to posting information within the CST application. However, the below warning banner is displayed providing that opportunity prior to logging in to eAuth.</p> <p>"This is a United States Department of Agriculture computer system, which may be accessed and used only for official Government business (or as otherwise permitted by regulation) by authorized personnel. Unauthorized access or use of this computer system may subject violators to criminal, civil, and/or administrative action. All information on this computer system may be intercepted, recorded, read, copied, and disclosed by and to authorized personnel for official purposes, including criminal investigations. Access or use of this computer system by any person, whether authorized or unauthorized, constitutes consent to these terms."</p> <p>During the collection of data in doing agency business, the individual may decline to provide information based on program business rules and regulations.</p>
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.



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No.	Question	Response
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A
9.3	How will the new data be verified for relevance and accuracy?	N/A
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?	<p>Since CST is accessible through eAuth, there isn't the "decline opportunity" or "notification of consent" to individuals prior to posting information within the CST application. However, the below warning banner is displayed providing that opportunity prior to logging in to eAuth.</p> <p>"This is a United States Department of Agriculture computer system, which may be accessed and used only for official Government business (or as otherwise permitted by regulation) by authorized personnel. Unauthorized access or use of this computer system may subject violators to criminal, civil, and/or administrative action. All information on this computer system may be intercepted, recorded, read, copied, and disclosed by and to authorized personnel for official purposes, including criminal investigations. Access or use of this computer system by any person, whether authorized or unauthorized, constitutes consent to these terms."</p> <p>During the collection of data in doing agency business, the individual may decline to provide information based on program business rules and regulations.</p>

No.	Question	Response
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.  No, all data collection is known to the customer. The aggregate of all data stored does not produce new revelations except in aggregations that produce agency-level statistics on program delivery.
12.1	What controls are in place to protect the data and prevent unauthorized access?	N/A
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.  The data is used for summary reporting and analysis. Sensitive information is not used in summary reporting. CST Reports are protected through the application roles and eAuth security.
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?	Performance data entered in the system can have a life of up to 10 years. Other files (including Owner, Operator and Producer (Volunteer/Employee) will exist in the active system as long as the person is involved in the supported business. Legal requirement for data retention are adhered to, as applicable, will be archived according to business regulations. The longevity of the system is not known, but data regularly outlives a particular processing system.
14.2	What are the procedures for purging the data at the end of the retention period?	A retention time for the current system data has not been determined by the business sponsors. When this is described, the usefulness of the data will be evaluated on a case-by-case basis to determine if it should be retained or not.





No.	Question	Response
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?	Data created by USDA and non-USDA staff about outside sources is reviewed for accuracy against existing agency data, and by the employees at local offices who have knowledge of the data. Toolkit does not have permissions for non-USDA staff data input. Plug-in has permissions for non-USDA staff data input. Data verification occurs through manual review, comparison with existing agency data, and by employees at local offices who have knowledge and responsibility of the data
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	N/A
17.2	Who is responsible for assuring the other agency properly uses the data?	N/A
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 checked="" type="checkbox"/> Yes <input 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?	The CST application implements a strict set of business rules which are inherent in the system design. This ensures continuity of data received by users because data availability to clients is only available by a single source.

## 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.)?	System managers, developers, agency field personnel, and NRCS managers. Plug-in users include TSPs.
21	How will user access to the data be determined?	Users do not have direct access to the system. All access is role-based through applications that control what information a particular user can view and update. Application access is described in the various business rules documentation that exists in the appropriate CoLab CST application projects.
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?	The CST system owner identifies very specific access privileges and authority. Each user is restricted to specific actions by the applications and to specific web screens by the eAuthentication (eAuth) security system.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  The application system owner identifies very specific access privileges and authority by user application role. Each user is restricted to specific actions by the software applications and to specific web screens by the application system.
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input 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.)?	Privacy and accessibility rules are identified and specified by the Agency CST system owner. System developers design in the appropriate security controls and the IT General Support Systems (GSS's) manages, controls, and maintains the specified controls.

No.	Question	Response
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"> <li>• Lost and Stolen equipment NRCS 800 number (1-888-926-2373) and/or e-mail address (<a href="mailto:nrcs.security@usda.gov">nrcs.security@usda.gov</a>).</li> <li>• Personal Identifiable Incidents – 877-744-2968 (PII-2YOU)</li> <li>• NRCS/CD - (202) 757-8111 or (703) 200-3008</li> </ul> <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>
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"> <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 <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?	General information that can identify the customer, provide means for contacting the customer, and basic demographic information for monitoring completeness of coverage in the delivery of agency conservation programs. This information is not used to hierarchically define customers based on their specific data.

No.	Question	Response
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 type="checkbox"/> Yes <input checked="" 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.)?	N/A
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)	N/A
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A

### 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 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

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(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.

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System Manager/Owner  
OR Project Representative  
OR Program/Office Head.

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Date

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

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Date

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Agency OCIO

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Date