USDA

Privacy Impact Assessment

Web Total Cost Account System (WebTCAS)

Revision: 1.0

Natural Resources Conservation Service (NRCS)

Date: July, 2009

Document Information

Owner Details	
Name	Kathy Green, Branch Chief, USDA-NRCS-ITC
Contact Number	(970) 295-5647
E-mail Address	Kathy.Green@ftc.usda.gov

Revision History			
Revision	Date	Author	Comments
1.0	7/27/2009	K. Hennings	Initial Fact Gathering – Initial Draft

Distribution List			
Name	Title	Agency/Office	Contact Information

Table of Contents

1 System Information

System Information	
Agency:	USDA - NRCS
System Name:	WebTCAS
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	NRCS employees record their individual time and attendance data using the WebTCAS Internet accessible web site interface. As data is submitted, several internal modules process it. These modules store the timesheet and profile information in database tables, use data to produce records from which employee paychecks are derived, produce views and screens used for other time record-keeping functions.
Who owns this system? (Name, agency, contact information)	Kathy Green, Branch Chief – USDA – NRCS – ITC Kathy.Green@ftc.usda.gov (970) 295-5647
Who is the Project Manager for this system? (Name, agency, contact information)	Paige Niederer, Project Manager – USDA – NRCS – ITC Paige.Niederer@ftc.usda.gov (970) 295-5496
Who is the security contact for this system? (Name, agency, contact information)	Chuck Hart, Information System Security Manager (ISSM) USDA – NRCS – ITC Chuck.Hart@ftc.usda.gov (970) 295-5550
Who completed this document? (Name, agency, contact information)	Kimberly Hennings, Systems Security Analyst USDA – NRCS – ITC (Contractor) Kim.Hennings@ftc.usda.gov (970) 295-5428

2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	NRCS employees record their individual time and attendance data using the WebTCAS Internet accessible web site interface. As data is submitted, several internal modules process it. These modules store the timesheet and profile information in database tables, use data to produce records from which employee paychecks are derived, produce views and screens used for other time record-keeping functions.
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	☒ Yes ☐ No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	WebTCAS is the application Federal NRCS employees use to record their individual time and attendance data for timesheet and payroll purposes.
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	Sources of the data in the system.	NRCS Employees
4.1	What data is being collected from the customer?	NRCS employees record their individual time and attendance data using the WebTCAS Internet accessible web site interface. As data is submitted, several internal modules process it. These modules store the timesheet and profile information in database tables, use data to produce records from which employee paychecks are derived, and produce views and screens used for other time record-keeping functions.
4.2	What USDA agencies are providing data for use in the system?	NRCS and NFC (empowHR)
4.3	What state and local agencies are providing data for use in the system?	None
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.	☐ Yes ☒ No – If NO, go to question 6.

No.	Question	Response
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	N/A
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A

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?	To gather financial information from employees: Hours worked, leave hours, arrival and departure times, time taken for lunch, activity code, extra accrued hours.
7	Will the data be used for any other purpose?	☐ Yes ☒ 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	☒ 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.)?	☐ Yes ☒ No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	☐ Yes ☐ No N/A
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes ☐ 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?	To gather financial information from employees: Hours worked, leave hours, arrival and departure times, time taken for lunch, activity code, extra accrued hours.

No.	Question	Response
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes ☒ 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?	☐ Yes ☒ No – If NO, go to question 13. First, the data does not get consolidated based on the type of data. Second, the WebTCAS system data is protected through application and contains no sensitive personal data other than described above.
12.1	What controls are in place to protect the data and prevent unauthorized access?	N/A
13	Are processes being consolidated?	☐ Yes ☒ 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?	☒ Yes ☐ 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?	It is required by regulation that timesheets be saved for 6 years.
14.2	What are the procedures for purging the data at the end of the retention period?	Currently there is no documentation of the procedures for disposing of the data and archived timesheets because the data has not reached its disposition period. The reports and data will be kept for a minimum of 6 years. The Program Manager will draft the procedures prior to the disposition of data.
14.3	Where are these procedures documented?	Currently there is no documentation of the procedures for disposing of the data and archived timesheets because the data has not reached its disposition period. The reports and data will be kept for a minimum of 6 years. The Program Manager will draft the procedures prior to the disposition of data.

No.	Question	Response
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?	After timesheets are submitted within the application by employees, an NRCS assigned "timekeeper" accesses all the timesheets for that timekeeper's group using authenticated web browser sessions, and verifies timesheets against the employees' job assignments, project codes, etc. Once they match, the timekeeper verifies the timesheets inside the application browser window. After the timekeeper verifies the timesheet, the supervisor then certifies that the timesheet is correct according to employee duties and responsibilities.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	☒ Yes ☐ 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.)?	☒ Yes ☐ No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	The USDA National Finance Center (NFC) issues employee paychecks based on the data.
17.2	Who is responsible for assuring the other agency properly uses the data?	The WebTCAS system owner.
18	Is the data transmitted to another agency or an independent site?	☐ Yes ☒ 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

No.	Question	Response
19	Is the system operated in more than one site?	☐ Yes ☒ No – If NO, go to question 20. The WebTCAS system is operated at one site. Procedures and processes are in place to assure continuance of operations and to assure the integrity of the system. However, in the event of outage, WebTCAS is setup for failover, not automatically, at Kansas City, NITC location. Failover instructions are located in Colab under Documents/Testing & Certification/WEBTCAS-NRCS_Failover_Test_Plan.doc. Furthermore, an installation manual is located in Colab under Documents/Deployment/WEBTCAS_Installation_Manual.doc and the operations guide is located in Colab under Documents/Deployment/WEBTCAS-NRCS Operations_Guide.doc.
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.)?	NRCS employees, timekeepers, supervisors, coordinators, and developers.
21	How will user access to the data be determined?	Access to the database is role-based through application systems that control what information a particular user can view and update. A WebTCAS operations manual is located in CoLab, however it is not intended for the user audience, it is an internal operations manual for the Project Manager and developers.
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☒ Yes ☐ No
22	How will user access to the data be restricted?	Users have restricted access to only the data they create. In addition, NRCS employee's access is restricted to specific actions by the software application and to specific web screens by the WebTCAS system.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes ☐ No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☐ Yes ☒ 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 WebTCAS system owner. System developers design in the appropriate security controls and the WebTCAS system manages, controls, and maintains the specified controls.
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Customers and employees can contact the NRCS Security Response/Access Control Team via the NRCS 800 number and/or e-mail address. 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.
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?	☒ Yes – If YES, go to question 27. ☐ 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: • 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 28.
27.1	Explain how this will be mitigated?	N/A
28	How will the system and its use ensure equitable treatment of customers?	All NRCS systems/applications are versioned controlled through NRCS and will inherit the security controls of the hosting system/network infrastructure(s).
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes ☒ 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?	☒ Yes ☐ 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.)?	Data is retrieved by the employee's ID which is assigned in the HR program empowHR.
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?	☐ Yes ☒ No

4 Technology

No.	Question	Response
31	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.
31.1	How does the use of this technology affect customer privacy?	Data is retrieved by the employee's ID which is assigned in the HR program empowHR.

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   Date

OR Project Representative

OR Program/Office Head.

_____   _____

Agency's Chief FOIA officer   Date

OR Senior Official for Privacy

OR Designated privacy person

_____   _____

Agency OCIO   Date