

Privacy Impact Assessment

Water & Climate Information System (WCIS)

Revision: 1.0

Natural Resources Conservation Service (NRCS)

Date: February, 2010



Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	2/1/2010	K. Hennings	Initial Draft

Distribution List			
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1 System Information

System Information		
Agency:	USDA - NRCS	
System Name:	Water & Climate Information System (WCIS)	
System Type:		
System Categorization (per FIPS 199):	☐ High ☐ Moderate ☐ Low	
Description of System:	The Water and Climate Information System (WCIS) supports the NRCS mission to provide agricultural water users and other water management groups in the western states area with water supply forecasts to enable them to plan for efficient water management. The system also provides the public and scientific community with a database that can be used to accurately determine the extent of the seasonal snow resource. The WCIS provides the necessary IT resources that support the collection, storage, quality control, analysis, and dissemination of high mountain climate data, water supply data, and soil climate data.	
Who owns this system? (Name, agency, contact information)	Wendall Oaks, Branch Chief – USDA – NRCS – ITC Wendall.Oaks@ftc.usda.gov	
Who is the Project Manager for this system? (Name, agency, contact information)	Laurel Grimsted – USDA – NWCC John.Brenner@ftc.usda.gov (970) 295-5616	
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2 Data Information

2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Categories of Data: Water & Climate • Snow water content • Snow depth • Precipitation • Net radiation • Redox • Additional soil moisture and soil temperature measurements • Water level • Surface temperature • Water quality parameters • Name, email address and eAuthentication ID of users Categories of Users: • NRCS Employees • Public Users Federal Agencies • BOR • COE • NOAA • USFS • USGS • NRCS • NRCS State Offices
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.	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.	
4	Sources of the data in the system.	BOR, COE, NOAA, NRCS, USFS, USGS
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?	NRCS, USFS RAWS System

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No.	Question	Response
4.3	What state and local agencies are providing data for use in the system?	State Department of Water Resources, Water Conservancy Districts, Irrigation Districts
4.4	From what other third party sources is data being collected?	MCC collects data from MS and WCIS pulls data via FTC from MCC Data Center
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.*See Question 4
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.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Final quality control checks are done by the NRCS Data Collection Offices (DCO). SNOTEL data is validated by quality control through the storage process. Hourly quality control checking occurs through the storage quality control process. Key characteristics of the data get quality controlled for validation. Additional quality checks are done by the DCOs. Snow Course data is manually reviewed. There are quality checks in the measurement and recording process. SCAN – SCAN data is manually reviewed realtime.
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?	N/A
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	

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No.	Question	Response
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?	N/A
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.
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. The retention time for data is period of record. The entire historical record is maintained in the database for all sites.

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No.	Question	Response
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
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 is retained for historical purposes.
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. No PII data.
17.1	How will the data be used by the other agency?	 Climate monitoring Water supply forecasting Drought assessment and mitigation Drought triggers Precision agriculture Soil survey interruption and mapping Crop production forecasts Range production and condition Disease and Pest prediction/mitigation Provide data for NWS and other agencies for flood forecasting and reservoir management Climate change assessment Water quality monitoring Air quality monitoring Underground utility lines
17.2	Who is responsible for assuring the other agency properly uses the data?	NRCS
18	Is the data transmitted to another agency or an independent site?	☐ Yes ☐ No – If NO, go to question 19.

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No.	Question	Response
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?	☐ Yes ☐ 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.)?	Everyone has access to the data because it is public information. Access for edits, changes and precise location is limited.
21	How will user access to the data be determined?	IRM-2, IRM-3, eAuthentication, See Training
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	
22	How will user access to the data be restricted?	Role-Based Access Control (RBAC), eAuthentication.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	 ∑ Yes ☐ No eAuthentication Protection, RBAC
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.)?	N/A - No Privacy Information

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No.	Question	Response
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	If incident response assistance is needed Customers and employees can contact the NRCS Security Response Team via the following numbers:
		 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
		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.
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?	System is not designed to provide equitable treatment of customers. Data is available to all customers regardless of who they are. It is public information.

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No.	Question	Response
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.)?	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 www.access.GPO.gov .)	
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes ☐ 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)?	 ∑ Yes ☐ No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	N/A – WCIS does not affect customer privacy.

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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.

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Privacy Impact Assessment Authorization

Memorandum

I have carefully assessed the ritracy impact A	33C3Stilent for the
Water Climate Information System (WCIS)	

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.

Luny J. Elmeler (acting)	9/21/10
Dr. Michael Strobel	Date
Director, NWCC	
Mary Alston NRCS FOIA/PA Officer	7/6/10 Date
Dong & 1Pm	6/28/10
Gary S Washington	Date

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