

# Privacy Impact Assessment FPAC\_ServiceNow

Policy, E-Government and Fair Information Practices

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# **Privacy Impact Assessment for the FPAC\_ServiceNow**

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## **Contact Point**

**Kurt Benedict, Information System Owner  
ADD USDA/FPAC-BC  
816-823-4212**

## **Reviewing Official**

**Amber Ross  
FPAC Privacy Officer  
United States Department of Agriculture  
(970)-295-5704**

## Abstract

- USDA’s FPAC\_ServiceNow is a frontend application that uses the Cloud Service Provider (CSP) ServiceNow software-as-a-service (SAAS) solution.
- ServiceNow is software-as-a-service (SAAS) used by the Information Technology Center (ITC) Help Desk for tracking and managing help desk incidents, problems, and requests. The system is hosted by ServiceNow Corporation in their high-availability environment.
- This Privacy Impact Assessment (PIA) is being conducted to comply with Federal Information Security Management Act of 2002 (FISMA) and the E-Government Act of 2002 (Public Law. 107-347, 116 Stat. 2899, 44 U.S.C. § 101, H.R. 2458/S. 803) Federal Law.

## Overview

FPAC\_ServiceNow is a frontend application that uses the Cloud Service Provider (CSP) ServiceNow software-as-a-service (SAAS) solution. The FPAC\_ServiceNow will consist of various ServiceNow applications and Help Desk services such as:

FPAC\_ServiceNow is a frontend application that uses the Cloud Service Provider (CSP) ServiceNow software-as-a-service (SAAS) solution. ServiceNow is software-as-a-service (SAAS) used by the Information Technology Center (ITC) Help Desk for tracking and managing help desk incidents, problems, and requests. The system is hosted by ServiceNow Corporation in their high-availability environment. The FPAC\_ServiceNow will consist of various ServiceNow applications and Help Desk services:

- Accounts Receivable Tracking Tool (ART)
- Action Register (AR)
- CCC Funding Services-Commodity Credit Corporation (CCC) Funding Services
- Directives Management Tool (DMT)
- Electronic Lease Management System (ELMS)
- Employee Care Center (ECC)
- FPAC-now
- Grants and Agreements (G&A)
- Internal Review Document and Tracking System (IRDTS)
- Non-Federal Onboarding (NFO)
- ServiceNow Help Desk
- Transfer of Station (TOS)
- USDA MyServices
- Vehicle Management Tool (VM)

G&A, ART, TOS, NFO and AR are called the USDA Mission Support Portal (Human Resources Service Portal). FPAC\_ServiceNow Human Resources (HR) modules are for the Mission Support Portal application, which is part of the Service Management (SM) bundle of ServiceNow, a cloud hosted PaaS product. ServiceNow Service Management (SM) is the ServiceNow service management application which allows organizations to manage business



functions that require a request-type workflow where requests are approved, qualified, assigned, and completed. The ServiceNow HRSM application automates standard HR processes within an organization. This automation eliminates the number of checklists, email exchanges, and phone calls performed by the HR team. Employees can access HR services, streamlining their HR request processes. These requests are tracked, and progress is monitored through the Mission Support Portal (MSP) dashboards.

The application operates under the following legal authority: The Soil Conservation Act, April 1935.regulations per Federal Register /Vol. 75, No. 27 /Wednesday, February 10, 2010, Rules and Regulations. The conservation provisions in the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill). Federal Register I Vol.74, No. 11 I Friday, January 16, 2009 I Rules and Regulations; 7 CFR Part 652; 16 U.S.C. 590 a-f, q, q-1 and other applicable authorities. Circular No. A-97, "Rules and regulations permitting Federal agencies to provide specialized or technical services to State and local units of government under Title III of the Intergovernmental Cooperation Act of 1968 > Types of services that may be provided. > Technical information, data processing, communications and personnel management systems services which the Federal agency normally provides for itself or others under existing authorities.

## 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?

- Name
- Legal name
- Address
- Contract numbers
- Vendor ID
- Customer information (name, address, miscellaneous identification numbers), reason for transaction, transaction value, transaction status, transaction status in the financial system.
- Specific agreement details – location, amount, date, FMMI codes.

FPAC\_ServiceNow collects social security numbers.

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

USDA employees and the general public.

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

- For tracking and managing help desk incidents, problems and requests.
- The Grants and Agreements Services Branch (GASB) provides comprehensive support for grants and agreements to all FPAC organizations. The GASB works directly with customers to support the planning, solicitation, evaluation, award, management and closeout of grants and agreements. It is the goal of the Grants and Agreements Services Branch (GASB) to provide timely services to customers that meet their needs in a manner that is also compliant with appropriate Federal, Departmental, and agency laws, regulations, and policies.
- Full Name only (First, Middle, Last)
- Email, Home Address, and Phone Number
- FPAC\_ServiceNow application does not ask for or store this information. However, we do require and attach resumes, official transcripts and therefore a school may

have SSN or some other unique identifier on that document that is given to the student. Although most organization no longer print that information on documents.

- FPAC\_ServiceNow does not ask for signatures from the participant but documents are loaded/housed in the system that contain signatures from FPAC employees such as required signatures on the AD332, etc.
- FPAC\_ServiceNow collects demographic data, (self-identified), (Hispanic, Native American, Asian, African American, Hawaii Pacific, White, Other. US Veteran, US Citizen, Blind or Disabled.
- Customer information (name, address, eAuthentication association number, agreement number, reason for transaction, transaction value, transaction status, transaction status in the financial system

### **1.4 How is the information collected?**

- By the members of the public who request Help Desk Assistance
- USAjobs.gov, Onsite Hiring Events, Diversity and Recruitment Inbox, SharePoint, Empower HR, E-Recruit. Online profile created by the applicant.
- Information is collected via members of FPAC staff. This corresponding information is entered into FPAC\_ServiceNow Cloud portal and tracked there.
- Information is not collected directly but is collected through other systems like PROTRACTS Grants.gov and other Grants & Agreements application systems.

### **1.5 How will the information be checked for accuracy?**

- Members of the public would know as to data accuracy. FPAC employees or licensee users may also check for accuracy.
- The information is verified by trained and qualified FPAC personnel for accuracy.
- FMMI is the financial system of record therefore all accounting information is entered into that system. ART is a workflow tracker/reporting system and is used in that manner. Quarterly reports from ART are sent to the divisions for review of accuracy.
- Other systems are responsible for the information they gather. Covered under GASB guidelines, Federal, Departmental, and agency laws, regulations, and policies

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

- Federal Register /Vol 75, No. 27 /Wednesday, February 10, 2010/Rules and Regulations.
- Paper Reduction Act of 1995 (44 U.S.C. 3501 et seq.)

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

- There is a moderate security concerns with compromise of PII involving names, tax identification number, social security numbers, etc.
- Mitigation consist of moderate security controls such as zRoles' e-authentication application, regular information security awareness training for employees, data encryption.
- It is possible that in order to open a help ticket, the general public may have open data field for a description of the issue. In this case a business process is in place. FPAC request that the general public do not enter PII. If they do enter PII anyway, FPAC redact the PII so that it is not in the system.
- Privacy risks are minimal in this application/system. This is because ServiceNow contains predominantly metadata as opposed to actual PII data elements themselves. Also, with so few PII elements, very few aggregate PII element context patterns exist.
- Privacy risks are mitigated because access to the information will be limited to appropriate and trained FPAC employee's only by the use of the USDA- OCIO e-Authentication application, which provides user authentication for FPAC. Role Based Access Control (RBAC) provides access enforcement for the Affiliates application. Other access requirements include the need for users to be on the USDA network backbone, using a CCE computer.
- Privacy concerns are negligible as minimal PII is collected.
- Privacy concerns are minimal as information is derived from FMMI and NOT directly collected from individuals
- Authentication being handled via USDA ICAMs eAuth system.
- Privacy risks are mitigated because access to the information will be limited to appropriate and trained FPAC employee's only by the use of the USDA- OCIO eAuthentication application, which provides user authentication for FPAC. Role Based Access Control (RBAC) provides access enforcement for the Affiliates.

## 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 reporting system supports many OCIO process throughout the enterprise. FPAC\_ServiceNow is software-as-a service (SAAS) used by the Information Technology Center (ITC) Help Desk for the tracking and managing help desk incidents, problems and requests. ServiceNow supports the CIO Help Desk Initiative.
- As an agency of the Federal Government, FPAC is required to follow the directives outlined in Executive Order 13562 – Recruiting and Hiring Students and Recent Graduates and is responsible for ensuring that all Pathways Program activities are managed responsibly and in accordance with regulations. The necessity to recruit and hire qualified and diverse employees drives FPAC to work cooperatively and collaboratively between headquarters (NHQ) and state offices further the FPAC mission.
- The information in ART is used to track the workflow requests from the division level to the ARSB. The information is also used to create workflow reports for management.
- FPAC has the authority to enter into a variety of agreements, depending on the program and authority. It is responsible for ensuring that all grants and agreements are managed responsibly and in accordance with laws and regulations. Agreements allow FPAC to work cooperatively with other Federal, State, nonprofit, and for-profit organizations to further the FPAC mission.

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

- N/A-PII data is not “analyzed” by any tools. No PII data is “produced” by ServiceNow.

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

Not Applicable



**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.**

- This application is in compliance with the Federal Information Security Management Act of 2002 (FISMA), USDA Office of the Chief Information Officer (OCIO) Directives, and U.S. National Institute of Standards and Technology (NIST) Special Publication 800-53, Revision 4 guidance.
  - Access Control (AC)
  - Authority and Purpose (AP)
  - Accountability, Audit, and Risk Management (AR)
  - Data Quality and Integrity (DI)
  - Security Awareness and Training Policy and Procedures (AT)
  - Identification and Authentication (IA)
  - Media Protection (MP)
  - Physical Access (PE)
  - Personnel Security (PS)
  - System and Communication Protection (SC)
  - System and Information Integrity (SI)

## 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?

- Data is not normally purged from the applications. It may be archived, as required by the sponsoring business. Per the System of Record Notice (SORN), "Records are maintained as long as the owner, operator, producer, or participant qualifies for conservation programs".
- Per NARA General Records Schedule 20, this application specific (minimal) PII information has been authorized by the FPAC Record Manager for erasure or deletion when the agency that this information is no longer needed for administrative, legal, audit or other operational purposes.
- The System of Record Notice is accessible at:  
<http://www.ocio.usda.gov/sites/default/files/docs/2012/NRCS-1.txt>.

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

- Yes. Per NARA Code of Federal Regulations - 36 CFR 1220, Subchapter B - Records Management and USDA OCIO Department Regulation 3080-001 at: <http://www.ocio.usda.gov/document/departmental-regulation-3080-001>.
- NARA Approval: NARA approval is required for all official records schedules. SF- 115 shall be submitted to NARA for approval. External approval has already been granted for records covered by the General Records Schedules (GRS). No external approval is required for the disposition of non-record materials. An informational copy of the SF-115, in both hard copy and electronic format, shall be provided to the Departmental Records Officer at the same time that the original is sent to 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.

- Primary risk is that a data breach could result in the appropriate release of data modeling. In turn, this information can help a hacker breach FPAC applications and systems. This is mitigated by limited to the data, non-portability of the data and controlled storage of the data on GFE in Government facilities.

## 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?**

- N/A-ServiceNow information is not shared with any other internal USDA organizations

**4.2 How is the information transmitted or disclosed?**

- N/A-ServiceNow information is not transmitted or disclosed to any other internal USDA organizations.

**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.**

- Privacy risks are mitigated by virtue of NOT sharing information.

## 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?

- The FPAC\_ServiceNow application is being accessed using eAuthentication. ServiceNow's information is not shared with organizations external to FPAC.

### 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.

- The FPAC\_ServiceNow application is being accessed using eAuthentication. ServiceNow's information is not shared with organizations external to FPAC.

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

- In order to implement the confidentiality requirements of Section 1619, FPAC has developed an "Acknowledgement of Section 1619 Compliance form, located at <http://directives.sc.egov.usda.gov/25283.wba> for FPAC cooperators to sign, which legally binds them to comply with the confidentiality provisions set forth in Section 1619. Disclosure may be made to contractors or to technical service providers when a written authorization has been received by the agency from the owner, operator, producer, or participant. Such disclosure shall be made subject to the purposes for which the contractor or technical service provider is hired. System access is restricted to authorized FPAC employees and conservation district employees working to assist with the implementation of natural resources programs. The electronic data retrieval system is secured by the USDA Common Computing Environment user authentication process and USDA eAuthentication login and password protection. Offices are locked during non-business hours.
- The ServiceNow application is being accessed using eAuthentication. ServiceNow's information is not shared with organizations external to FPAC.

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

- Privacy risks are mitigated by virtue of NOT sharing information.

## 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 Does this system require a SORN and if so, please provide SORN name and URL.

- Refer to Appendix A: USDA Natural Resources Conservation Service, Privacy Policy. This policy is accessible by individuals from any FPAC public website.
- When accessing an application, that requires a sign in for the individual, the individual must have an approved eAuthentication login and password. If the individual has eAuthentication approval, upon accessing the application, the USDA OCIO eAuthentication harmer provides the required notice.
- Per the System of Record Notice (SORN) at <http://www.ocio.usda.gov/NRCS-1.txt> and Freedom of Information Act website at <http://www.nrcs.usda.gov/about/foia/>, General Manual Part 408, SUBPART C, 408.45 'Notice of Privacy Act System of Records - Owner, Operator, Producer, or Participant Files - USDA/NRCS - 1:
- (6) Notification Procedure:

Any individual may request information regarding this system of records, or information as to whether the system contains records pertaining to him/her by contacting the respective district conservationist or other designee. If the specific location of the record is not known, the individual should address his/her request to the Director, Management Services Division, USDA-Natural Resources Conservation Service, P. O. Box 2890, Washington, D.C. 20013, who will refer it to the appropriate field office. A request for pertaining to an individual should contain: name, address, and other relevant information (e.g., name or nature of program, name of cooperating body, etc.).

- “Notice” is provided to the users regardless of the fact that No PII is directly solicited from any individual to support this application.

### 6.2 Was notice provided to the individual prior to collection of information?

- Yes

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

- Yes

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

- Yes. Individuals consent to the particular use of their information by becoming a participant in a specific FPAC conservation program. Participation is at the discretion of the individual. The FPAC program rules and regulations, which are explained to the individual, determine the specific information required to participate in the specific FPAC program(s) for which the individual enlisted.

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

- Notice” is provided to any individual users by ServiceNow. There is limited risk that an individual would be unaware of “collection”, because limited PII is solicited from any individual user by this application. Only FPAC staff/administrators (with background checks and training) have access to that PII.

## 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?

- N/A- No procedures are required. Individuals have automatic access to their own profiles. Individuals can modify their own profiles by clicking their name in the upper right corner.

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

- N/A- No procedures are required. Individuals have automatic access to their own profiles. Individuals can modify their own profiles by clicking their name in the upper right corner.

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

- N/A- No procedures are required. Individuals have automatic access to their own profiles. Individuals can modify their own profiles by clicking their name in the upper right corner.

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

- N/A-See 7.2

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

- N/A-See 7.2
- There are limited privacy risks especially associated with the “redress” process for this repository. There is limited risk that an individual would be unaware of “redress” that is available. While limited PII is solicited from any individual user by this application, ServiceNow administrators / users can correct any inaccurate or erroneous information in their own profiles.

## 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?**

- The ServiceNow application is being accessed using eAuth. Access within this application is enforced via Role Based Access Control (RBAC) on a valid “need to know” basis, determined by requirements to perform applicable official duties. The application has documented Access Control Procedures in compliance with FISMA and USDA directives. See Section 2.4

### **8.2 Will Department contractors have access to the system?**

- Yes. Authorized contractors and partners will have access to the system consistent with their roles and responsibilities. Access to ServiceNow is controlled through RBAC and eAuth..

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

- Annual organizational Privacy Awareness Training is mandatory for all FPAC personnel. FPAC requires that every employee and contractor receives information security awareness training before being granted network and account access, per General Manual, Title 270, Part 409 - Logical Access Control and Account Management. Annual Security Awareness and Specialized Training is also required, per FISMA and USDA policy, and is tracked by USDA.

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

- Yes. The following systems received their Authority To Operate (ATO) as follows:
  - Grants and Agreements (G&A) 1/17/2018
  - Accounts Receivable Tracking Tool (ART)- 1/17/2018
  - FPAC\_ServiceNow- 1/4/2018



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

- Logging to AIMS logging service
- Access Control
- Authentication
- Authorization
- Encrypted data in transit
- Accessible only on USDA network
- FPAC complies with the "Federal Information Security Management Act of 2002" (FISMA). Assessment and Accreditation, as well as annual key control self-assessments, and continuous monitoring procedures are implemented for this application per the requirements given in National Institute of Standards and Technology (NIST) Special Publication 800-53 Revision 4. Additionally, FPAC complies with the specific security requirements for "auditing measures and technical safeguards" provided in OMB M-07-16. Finally, the system provides technical safeguards to prevent misuse of data including:
  - Confidentiality: Encryption is implemented to secure data at rest and in transit for this application (e.g., by FIPS 140-2 compliant HTTPS and end- user hard disk encryption). The documents that are passed to and maintained in ServiceNow are encrypted in transit.
  - Integrity: Masking of applicable information is performed for this application (e.g., passwords are masked by eAuth).
  - Access Control: The systems implement least privileges and need to know to control access to PII (e.g., by RBAC).
  - Authentication: Access to the system and session timeout is implemented for this application (e.g. by eAuth and via multi-factor authentication for remote access).
  - Audit: Logging is implemented for this application (e.g. by logging infrastructure).
  - Attack Mitigation: The system implements security mechanisms such as input validation.

**Notice:** For the privacy notice control, please see Section 6 which addresses notice. For the privacy redress control, please see Section 7 which addresses redress.

## 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?**



## Privacy Impact Assessment – FPAC\_ServiceNow

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- ServiceNow does not directly collect any PII from any individual user, but does collect minimal PII with the login/profile set-up, which is obtained from other sources( see Section 1.0 above) Data extracts containing PII are not obtained from the systems, therefore, there is no privacy risk for this area.
- Any privacy risks identified in this system are mitigated by the security and privacy safeguards provided in Section 8.5 and by the security controls discussed in Section 2.4 above. Remediation of privacy risks associated with internal/external sharing are not applicable pursuant to PIA Sections and 5 respectively.

## 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 system is comprised of front-end web applications and back end compute/processing applications.
- ServiceNow is a software –as-a service (SAAS) used by the FPAC Information Technology Center (ITC) Help Desk for tracking and managing help desk incidents, problems and requests. The system is hosted by ServiceNow Corporation in their high-availability environment. This application supports user access control authorization and validation.

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

- No, the project utilizes Agency approved technologies, and these technology choices do not 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.

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

ServiceNow is a software –as-a service (SAAS) used by the FPAC Information Technology Center (ITC) Help Desk for tracking and managing help desk incidents, problems and requests. The system is hosted by ServiceNow Corporation in their high- availability environment.

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

- No personally identifiable information would be entered by users. It is possible that scanned documents do contain this information. The application is FEDRAMP certified and relies on e-Authentication for access and is housed in a secure environment per FEDRAMP standards.
- Name, address (“address” may or may not be non-PII work contact information-see question 1.1). Department Privacy Office allows the agency discretion as to whether to conduct a PIA in cases where minimal, if any PII.
- The data that is collected and maintained by ServiceNow is, for the most part, limited to business email address and/or business phone number for members of the public who request Help Desk assistance. Similarly, ServiceNow maintains work phone and email contacts for FPAC employees and contractors.

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

- Only licensed users with specific roles have access to system records, including the limited data.

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

- The ServiceNow application is being accessed using eAuth. Access within this application is enforced via RBAC on valid “Need to know” basis, determined by requirements to perform applicable official duties.

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

- PII is NOT received directly from the user, therefore does not become available through the use of 3rd party website. Information is not purged automatically in the ServiceNow application but can be deleted at an administrator’s request. Actions would still be retained in an audit log.

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

PII is NOT received directly from the user, therefore does not become available through the use of 3rd party website. Access to the information will be controlled by Role-base authorization and e-Authentication. PII is likely only available through scanned documents and not indexed from a search functionality.

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

Only registered users of the application through Role-based authorization and e-Auth that can see scanned documents<sup>10.9</sup>

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

**10.10 Does the system use web measurement and customization technology?**

No, the system does not use web measurement and customization technology

**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?**

No

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

PII should only be available in this application through the scanning functionality. The application is not intended to handle PII but has security parameters to control it. The application is FEDRAMP certified, this certification gives a strong indication of secure. Log In will also be controlled by USDA’s e- Authentication functionality.



## Privacy Impact Assessment – FPAC\_ServiceNow

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I have carefully assessed the Privacy Impact Assessment for the FPAC\_ServiceNow system.

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Kurt Benedict  
FPAC\_ServiceNow Information System Owner

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Date

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Lanita Thomas  
Information Systems Security Program Manager

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Date

\_\_\_\_\_  
Amber Ross  
FPAC Privacy Officer

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Date