

Privacy Impact Assessment

Financial Assistance Tracker (FA Tracker)

Technology, Planning, Architecture, & E-Government

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Privacy Impact Assessment for the Financial Assistance Tracker (FA Tracker)

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Abstract

Financial Assistance (FA) Tracker is a tracking system used by Program Support Specialists (PSS), with the Natural Resources Conservation Service (NRCS), that uses specified criteria to search for existing contracts and then shows those contracts in work lists.

A Privacy Threshold Analysis (PTA) was performed, indicating that a PIA must be completed. This PIA is being conducted to comply with the Federal Information Security Modernization Act of 2014 (FISMA) (44 U.S.C. §3551 to §3559) and the E-Government Act of 2002 (Pub. Law. 107-347, 44 U.S.C. §101).

Overview

FA Tracker is a system of the Natural Resources Conservation Service (NRCS). NRCS provides private landowners with advice, guidance and technical services to carry out conservation practices. The NRCS is an agency within the USDA that has provided over 75 years of leadership in a partnership effort to help America's private land owners and managers. NRCS works with its partners to conserve their soil, water, and other natural resources by providing financial and technical assistance based on sound science and technology suited to a customer's specific needs.

The purpose of the FA Tracker application is to query contracts and applications in ProTracts, potentially also pulling information from other systems such as Fund Manager and determining a set of data that is in need of Program Support Specialist (PSS) intervention.

When a user logs in, they are presented with a landing page consisting of the (currently) 20 work lists. Clicking on one opens the work list and will fetch and display the data in real time. This data will be constrained to what the user has access to in ProTracts using zRoles.

A user can then filter and sort this data on the client side. Optionally, they can export this work list to MS Excel on their device. Users can also subscribe to e-mail alerts. The e-mail alerts will contain the same data and fields as the work lists, but will be comprised of only the additional records not present in their previous e-mail alert (new deltas).

Legal Authority: This system is regulated by privacy laws, regulations and government requirements, including the Clinger-Cohen Act of 1996; the E-Government Act of 2002 (Pub. Law. 107-347, 44 U.S.C. §101); the Paperwork Reduction Act of 1995 (44 U.S.C. §3501). Guidance can be found in Appendix III to OMB Circular A-130 and NIST SP-800-30, Risk Management Guide for Information Technology Systems.

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?

- FA Tracker pulls its information from NRCS' ProTracts-FundManager (PT-FM), which pulls its information from the SCIMS database. PT-FM receives PII from the SCIMS database copy (see Section 1.2).
- FA Tracker uses, processes or maintains information acquired from PT-FM to identify and classify work items in need of Program Support Specialist (PSS) intervention at three levels: Application, Contract, and Contract Item.
- The PII that is used, processed or maintained by FA Tracker includes name, address, as well as the following:
 - Application #
 - Contract #
 - Contract Item #
 - State
 - County
 - Field Office
 - Number of days until/passed a specific date of interest
 - Contract Modification Reason
 - Contract Modification Status
 - Status of a Payment (E.g. "Waiting for participant signed date")
 - Other Eligibility (Yes/No)
 - AD-1026 (Y/N)
 - FTE (Y/N)
 - AGI (Y/N)
 - Member AGI (%)
 - Vendor Code (E.g. "Pending")
 - Application Status (E.g. "Eligible")
 - Adequacy Status (E.g. "Pending")
 - Obligation Status (E.g. "Pending")
- NRCS users do not have direct access to SCIMS.

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

- FA Tracker pulls its information from NRCS' ProTracts-FundManager (PT-FM) which pulls the information from the SCIMS database.

- The *Service Center Information Management System (SCIMS)*, maintained by FSA, Service Center Information Management System (SCIMS), CSAM ID # 1672, is the database of customer information that is shared by the three Service Center Agencies, FSA, NRCS, and Rural Development. SCIMS is a repository for USDA business entity and conservation compliance information. This link allows the most current customer information to be printed on forms and letters. It also allows NRCS managers to generate reports on the race, sex, national origin, and disability of program applicants and participants.
- NRCS has access to a copy of the SCIMS database via replication and access to the data from SCIMS for NRCS users is via the National Planning and Agreements Database (NPAD) [which resides on PT-FM] and through eAuthentication (eAuth). NRCS users do not have direct access to SCIMS. The landowners and general public applicants may provide information to SCIMS, which is the source of the PII. All information is obtained through a database copy. FA Tracker does not modify or update any information in SCIMS.

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

- FA Tracker uses, processes and maintains PII data obtained from the SCIMS database copy by PT-FM at the Application, Contract, and Contract Item levels for identifying and classifying work items in need of PSS intervention.

1.4 How is the information collected?

- FA Tracker pulls NRCS' ProTracts-FundManager (PT-FM) data via encrypted web services on the USDA network.
- PT-FM collects landowner information from the SCIMS database, using the SCIMS ID of the affected individual and the SCIMS IDs from the SCIMS database copy. NRCS users do not have a direct access to SCIMS. All information is obtained through a database copy.

1.5 How will the information be checked for accuracy?

- The accuracy of PII obtained from SCIMS or other applications not maintained by NRCS is not within the scope of FA Tracker. FA Tracker does not have the ability to update any information in SCIMS, nor does it have the ability to update the information in any other application databases not maintained by NRCS.

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

These regulations are applicable:

- Privacy Act (5 U.S.C. §552a);
- E-Government Act of 2002 (Pub. Law. 107-347, 44 U.S.C. §101);
- Paperwork Reduction Act of 1995 (44 U.S.C. §3501)

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

- FA Tracker does not directly collect any PII from any landowner.
- The primary privacy risk is that sensitive personal information relative to landowners could be released to unauthorized personnel.
- Privacy risks are mitigated as access to the information will be limited because users are authenticated via the USDA eAuth system and authorized via USDA's role based authorization for end-user access to the application.
- Please see Section 2.4 and Section 8.6 for a further discussion of security controls that are in place to mitigate privacy risks.

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 is used to identify and classify Applications, Contracts, and Contract items in need of PSS intervention. FA Tracker does this by running specific queries over the data and displays minimal information to users in the form of work lists. Additional information/details can be accessed via a link to NRCS' ProTracts-FundManager (PT-FM) application.

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

- SQL queries in MS SQL server are used to analyze the PT-FM data for inclusion in building work lists. No new records are created.
- No Other tools are used to analyze the data

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

- FA Tracker 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.

- Access to the system and data are determined by business need and individual roles. Controls are in place to provide reasonable assurance that data integrity and confidentiality are maintained during processing. Controls in place to ensure the correct handling of information include the following:
 - End users are correctly identified and authenticated according USDA and FPAC security policies for access managements, authentication and identification controls.
 - Audit logging is performed at the Department-level to ensure data integrity.
- This application is in compliance with the FISMA and the security and privacy controls provided in the U.S. National Institute of Standards and Technology (NIST) Special Publication 800-53, Revision 4.
- If any residual risks are identified, they will be managed and reported via the FISMA mandated risk assessment processes.

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?

- All information contained will be retained in compliance with NARA Guidelines, which vary on average in years from less than one year to more than ten years according to the NARA General Records Schedules Transmittal 29, issued December 2017.
- Per the NRCS-1 System of Record Notice (SORN), “Records are maintained as long as the owner, operator, producer, or participant qualifies for conservation programs”.

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

- Yes, in accordance with USDA Directive DR 3080-001: Appendix A: Scheduling Records.

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

- The primary privacy risk is that a data breach could result in the release of information on members of the public. This is mitigated by limited access to the data, nonportability of the data and controlled storage of the data located in controlled facilities.
- Retention of application-specific data is required to meet business and organizational requirements for this particular information system. The risks associated with retaining application-specific information are mitigated by the controls discussed above.

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?

- FA Tracker does not share or transmit any information to NRCS' ProTracts-FundManager (PT-FM) nor does it update any information in PT-FM. Integration with PT-FM is obtain information as read-only.
- FA Tracker obtains information from PT-FM which obtains information related to landowners from SCIMS. Neither FA Tracker nor PT-FM share or transmit any information to SCIMS, nor do they update any information in SCIMS.

4.2 How is the information transmitted or disclosed?

- FA Tracker information is only transmitted to NRCS enterprise databases via client to web-server and web-server to database. Encryption between the client and the web service uses the encryption used by eAuth.
- NRCS has access to a copy of the SCIMS database via replication. Access to the data is through established security rules via eAuth.

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 ensuring that access to the data is through established security rules via eAuth. Any residual risks are mitigated by the controls discussed in Section 2.4 above.

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?

- *N/A*- PII is not shared or disclosed with organizations that are external to 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.

- *N/A*- PII is not shared or disclosed with organizations that are external to the USDA.
- However, FA Tracker is subject to the NRCS-1 SORN. URL: <https://www.ocio.usda.gov/sites/default/files/docs/2012/NRCS-1.txt>

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

- *N/A*- PII is not shared or disclosed with organizations that are external to the USDA.

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 external to the USDA. Any residual risks are mitigated by the controls discussed in Section 2.4 above.

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.

- FA Tracker is subject to the NRCS-1 SORN. URL: <https://www.ocio.usda.gov/sites/default/files/docs/2012/NRCS-1.txt>

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

- Yes. NRCS Privacy Policy published on USDA website. Any collection of PII information is done in NRCS' ProTracts-FundManager (PT-FM), details on notice provided to individuals is in the Privacy documents for PT-FM

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

- This information is not collected in the FA Tracker application. The information is collected in PT-FM; information on a user's opportunity and/or right to decline to provide information is documented in the PT-FM system privacy documents.
- Any PII information is obtained from the SCIMS system, which is maintained by FSA. Members of the Public do not have access to this application.

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

- This information is not collected in the FA Tracker application. The information is collected in PT-FM.
- Any PII information is obtained from the SCIMS system, which is maintained by FSA. Members of the Public do not have access to this application.

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.

- Any PII information that is obtained from the PT-FM system was obtained from the SCIMS system, which is maintained by FSA. Details on this information is documented in the PT-FM system privacy documents.

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?

- As published in SORN USDA/NRCS-1: “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, DC 20013, who will refer it to the appropriate field office. A request for information pertaining to an individual should contain: Name, address, and other relevant information (e.g., name or nature of program, name of cooperating body, etc.).”
- Any PII information obtained from the SCIMS system would be subject to the applicable procedures to allow individuals to gain access to their SCIMS information, as maintained by the FSA. Note that the applicable procedures to allow individuals to gain access to their SCIMS information are maintained outside of the accreditation boundary of this application by SCIMS.

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

- PII information in FA Tracker is obtained from NRCS’ ProTracts-FundManager (PT-FM).
- Any PII information obtained from the SCIMS system by PT-FM would be subject to the applicable procedures to allow individuals to gain access to their SCIMS information, as maintained by the FSA. Note that the applicable procedures to allow individuals to gain access to correct their SCIMS information are maintained outside of the accreditation boundary of this application by SCIMS.
- As published in SORN USDA/NRCS-1: “Any individual may obtain information as to the procedures for contesting a record in the system which pertains to him/her by submitting a written request to the district conservationist or his/her designated representative or to the Director, Management Services Division, USDA-Natural Resources Conservation Service, P.O. Box 2890, Washington, DC 20013.”

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

- The SORN USDA/NRCS-1 is published on the USDA.gov website.
- Any PII information obtained from the SCIMS system would be subject to the applicable procedures to allow individuals to gain access to their SCIMS information, as maintained by the FSA. Note that the applicable procedures to allow individuals to gain access to correct their SCIMS information are maintained outside of the accreditation boundary of this application by SCIMS.

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

- *N/A*- See section 7.3.

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

- The risk associated with redress is considered low, as the public does not have access to the system or the data.
- Any PII information obtained from the SCIMS system would be subject to the applicable procedures to allow individuals to gain access to their SCIMS information, as maintained by the FSA. Note that the applicable procedures to allow individuals to gain access to correct their SCIMS information are maintained outside of the accreditation boundary of this application by SCIMS.
- Residual privacy risks associated with the redress process for individuals are mitigated since individuals can use the relevant procedures discussed above to update their original public records.

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?

- Access to the FA Tracker application/system is determined via the USDA eAuth system (level II) and authorized via USDA's Role Based Access Control (RBAC) model for end-user access to the application.
- The application/system 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. If a user has access to NRCS' ProTracts-FundManager (PT-FM), they may have access to FA Tracker. Contractors are required to undergo mandatory background investigations commensurate with the sensitivity of their responsibilities, in compliance with Federal requirements and must obtain Level 2 eAuthentication access
- As part of the FPAC onboarding process, contractors must meet all requirements for access to applications. Through the USDA Rules of Behavior, they are not allowed to download, share, store or print any USDA specific data.
- All roles are approved on a need-to-know basis via FPAC BC management
- Contractors are required to sign NDAs as per the USDA FPAC BC Onboarding process

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

- NRCS requires that every employee and contractor receives information security awareness training before being granted network and account access, which contains the requisite privacy training, and Annual Security Awareness and Specialized Training, as required by FISMA (NIST SP 800-53 rev 4) and USDA policies (USDA OCIO DR 3545-001 – Information Security Awareness and Training Policy and USDA OCIO DR 3505-003 - Access Control Policy).

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

- FA Tracker is a Moderate system
- The initial ATO for FA Tracker was March 7, 2016.
- The most recent ATO renewal for FA Tracker was March 28, 2019. The current ATO expires on March 28, 2022

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

- NRCS complies with the "Federal Information Security Modernization Act of 2014" (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, Rev. 4. Additionally, 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).
 - Integrity: Masking of applicable information is performed for this application (e.g., passwords are masked by eAuth).
 - Access Control: The systems implements least privileges and need to know to control access to PII (e.g., by RBAC). Administrative and management operational controls in place to ensure proper access termination.
 - 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?

- FA Tracker does not directly collect any PII from any affected landowner (i.e., member of the public), but FA Tracker does utilize PII within the system obtained by PT-FM from the SCIMS database copy, which is maintained by FSA (see Section 1.0 above). Data extracts containing PII are not regularly obtained from the system, therefore, privacy risk from this area is limited and addressed through IT Data Extract processes controls. Any PII information is obtained from the SCIMS database, copied from the SCIMS system, which is maintained by FSA.
- 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 addressed in PIA Sections 4 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?

- FA Tracker is a tracking system used by PSSs that uses specified criteria to search for existing contracts and then shows those contracts in work lists. FA Tracker will run queries over NRCS' ProTracts-FundManager (PT-FM) (and possibly) other data.

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

- No, FA Tracker 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 3rd party websites and/or applications?

- *N/A* - Third party websites / applications are not used.

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

- *N/A* - Third party websites / applications are not used.

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

- *N/A* - Third party websites / applications are not used.

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?

- *N/A* - Third party websites / applications are not used.

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

- *N/A* - Third party websites / applications are not used.

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

- *N/A* - Third party websites / applications are not used.

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?

- *N/A* - Third party websites / applications are not used.

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)?

- *N/A* - Third party websites / applications are not used.

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?

- *N/A* - See section 10.10.

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.

- FA Tracker does not provide access or link to Third Party websites or applications. In addition, the system does not use web measurement or customization technology.



Agency Responsible Officials

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Date

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