



United States
Department of
Agriculture

Privacy Impact Assessment (PIA)

Farm Service Agency
DAFP/CEPD
6501 Beacon Drive
Kansas City, MO 64133-4676

The Conservation System (CS)

Date: September 4, 2008



- Conservation Reserve Program (CRP)
 - Conservation On-line System (COLS)
 - CRP Re-enrollment and Extensions (REX)
 - General Signup Offer Process (GSOP)
 - Continuous Sign-up Offer Process (CSOP)
 - State Areas for Wildlife Enhancement (SAFE)
 - Signup Configuration
 - Soils Database Management System (SDMS)
 - CRP Contracts
 - Conservation Legacy Upload
 - Emergency Forestry Conservation Reserve Program (EFCRP)
- Emergency Conservation Program (ECP)
- Conservation Reporting & Evaluation System (CRES)
- Grassland Reserve Program (GRP)
- CORVID (COTS)

Revision: Final V.2



Document Information

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Document Revision and History			
Revision	Date	Author	Comments
Draft V.1	June 26, 2008	R. Houston, EDS	Initial document
Draft V.2	July 1, 2008	Gloria Scoby PSCAO, CSSG	Updated 2.7, 3.1, 3.1.1 (1, 3,), 3.1.2 (5, 6), 3.1.4 (1, 2), 3.1.5 (4), 3.1.6 (4, 6), 3.1.7 (1.1, 1.3), 4.
Draft V.3	July 17, 2008	R. Houston, EDS	Removed edit comments, updated data use information after clarification with author. Updated contact info.
Draft V.4	August 4, 2008	R. Grant-Smith, ECS	Per Gloria Scoby, I made changes to sections 2.2.1.5 and 2.2.2.
Draft Final	August 6, 2008	R. Grant-Smith, ECS	Made changes throughout document based on recommendation from Gloria Scoby.
Final V.1	08/29/2008	R. Grant-Smith, ECS	Per Sue Bussells' recommendation, made changes to section 2.5.
Final V.2	9/4/2008	R. Grant-Smith, ECS	Per S. Nuessle's recommendation, made changes to the signature page swapping Karen Malkin, CPO, with Brian Davies, ISSPM.



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1 Purpose of Document

USDA DM 3515-002 states: "Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner's requirements presents any threats to privacy."

The Privacy Impact Assessment (PIA) document contains information on how The Conservation System (CS) affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems*.



2 Applicability

2.1 Applicability of System

The information in this document is applicable to The Conservation System (CS).

2.2 System Overview

The Conservation System major application consists of five minor applications that support the USDA Farm Service Agency mission. The minor applications consist of the Conservation Reserve Program (CRP), Emergency Conservation Program (ECP), Conservation Reporting & Evaluating System (CRES), Grassland Reserve Program (GRP), and CORVID, a commercial-off-the-shelf (COTS) program. Additionally, there are five (5) components and five (5) sub-component applications within the CRP application; these are listed below. The applications are used by USDA employees to deliver services to farmers involving environmental quality, conservation of natural resources, emergency conservation, and land use and rural development.

The system contains Personally Identifiable Information (PII) about farmers that is available to approximately 3200 USDA employees throughout the United States and US territories. No access to the system is available to the general public. Users are generally categorized by their location, having access to resources that is restricted by either the county, state, or national role that they occupy. While most users are employees of FSA, one application grants limited access to employees of NCRS to update soils information.

2.2.1 Conservation Reserve Program (CRP)

The USDA Conservation Reserve Program is a voluntary business program for agricultural landowners providing incentives and assistance to farmers and ranchers for establishing valuable conservation practices that have a beneficial impact on resources on and off the farm. Through voluntary partnership between individuals, environmental groups, state governments, and the Federal Government, farmers and ranchers receive annual rental payments and cost-share assistance to establish long-term, resource conserving covers on eligible farmland. CRP is administered by the Farm Service Agency, with NRCS providing technical land eligibility determinations, conservation planning and practice implementation.

The Commodity Credit Corporation (CCC) makes annual rental payments based on the agriculture rental value of the land, and it provides cost-share assistance for up to 50 percent of the participant's costs in establishing approved conservation practices. Participants enroll in CRP contracts for 10 to 15 years. It is the Federal Government's largest environmental improvement program and is responsible for the management and safeguarding of more than 33 million acres of American topsoil from erosion, for increasing wildlife habitat, and for protecting ground and surface water.

The minor application by the same name, the Conservation Reserve Program (CRP), supports the electronic data processing needs of the business program described above as the CRP application allows users to record, process, and maintain offers for producer acreage.

The Conservation Reserve Program (CRP) application consists of five components that interrelate:

- Conservation On-Line System (COLS)
- Soils Database Management System (SDMS)
- CRP Contracts



- Conservation Legacy Upload
- Emergency Forestry Conservation Reserve Program (EFCRP)

2.2.1.1 Conservation On-Line System (COLS)

The Conservation On-Line System (COLS) is a component that gets its name from the applications that are made available to users through web services in the on-line FSA intranet. The COLS contains five web-based sub-components that have similar roots and functionality.

The COLS sub-components are accessed by county, state and national users that are assigned access roles relative to their location. Users enter and access the personal data of farmers through a business process that involves direct personal contact with the farmers, an enrollment process, and the issuing of payment contracts for conservation services. Approximately 3200 county, state, and national users have access to COLS.

2.2.1.1.1 CRP Re-enrollment Extensions (REX)

CRP Re-enrollment is a sub-component that allows farmers and ranchers to re-enroll their land in the Conservation Reserve Program general sign-up process when their contracts expire. REX contracts are offered either as an extension or re-enrollment for CRP contracts that will expire during the period of September 30, 2007 through September 30, 2010. REX contracts in county offices that have reached a 25% cropland participation limit for the county receive 1, 2 or 3 year extensions instead of 4 or 5 year extensions and instead of 10-15 years of re-enrollment. REX is used for general signup for numbers 12, 13, 15, 16, 18 and 20.

The process begins as notifications are printed and sent to producers. Producers respond and provide offer information to county employees who enter the offer information into the system. Producers re-enroll at the current rate for 10 or 15 years or extend their current contracts 1 to 5 years. The type of data is signup specific and includes producer's personally identifiable information, and information about acres, crop history, practices, soils and participant submission. Some of this information is obtained from web services such as Crop, Crop List, Compliance, Farm Records and SCIMS.

REX processing includes the data entry into the COLS REX application, the update of the Conservation database and the transmission of the data to the S/36 (or manually entered into the S/36 CRP system), and the creation of the contract on the S/36. Contract maintenance is done on the S/36 and annual payments are made on the S/36. The roles of users are county, state and national employees. The number of users is approximately 3200.

2.2.1.1.2 General Sign-up Offer Process (GSOP)

General Signup occurs when farmers and ranchers compete nationally during designated sign-up periods. Participants bid to retire land from production for 10-15 years. Contracts are awarded by the FSA based on the assessment of the land's environmental value using an Environmental Benefits Index (EBI). If the land is accepted, the landowner may enroll the land, receive annual rental payments for it, and maintain the land under an approved conservation plan. General Signup CRP acreage often enrolls whole fields and farms.

The General Signup Offer Process (GSOP) is a sub-component that allows county offices to enter and maintain CRP offer data for all General Signups, allows State offices to view all CRP offers for their state, allows National level personnel to view all CRP offers for all states and to do analysis of those offers, and allows National employees to enter and maintain the national program settings for CRP general offers.



The flow of the process includes county employees who enter a producer's bid information into GSOP where the bids are ranked according to program criteria. A letter of acceptance is sent to the producer that has an acceptable bid. The producer accepts the offer and signs the appropriate forms which are then entered into GSOP by county employees. The submitted offer is transmitted to the S/36 where it becomes a contract for 10 to 15 years and receives annual payments.

The type of data is signup specific and includes producer's personally identifiable information, and information about acres, crop history, practices, soils and participant submission. Some of this information is obtained from web services such as Crop, Crop List, Compliance, Farm Records and SCIMS.

GSOP processing includes the initial data entry into the application, the update of the Conservation database and the transmission of the data to the S/36 (or manually entered into the S/36 CRP system), and the creation of the contract on the S/36. Contract maintenance is done on the S/36 and annual payments are made on the S/36. The roles of users are county, state and national FSA employees. The number of users is approximately 3200.

2.2.1.1.3 Continuous Sign-up Offer Process (CSOP)

Environmentally desirable land devoted to certain conservation practices may be enrolled in CRP at any time under continuous sign-up. Offers are automatically accepted provided the land and producer meet certain eligibility requirements. Continuous sign-up offers are not subject to the competitive bidding process that is used in the General Signup Offer Process. Business processes that use the continuous sign-up process include the Conservation Reserve Enhancement Program (CREP and the Farmable Wetland Program (FWP).

The Continuous Sign-up Offer Process (CSOP) web sub-component allows county offices to enter and maintain CRP offer data, State offices to view all CRP offers for their state, National level personnel to view all CRP offers for all states and to do analysis of those offers, and National employees to enter and maintain the national program settings for CRP general offers.

The flow of the process includes county employees who enter a producer's offer information into CSOP. The producer accepts the offer and signs the appropriate forms and the county employee then enters the acceptance into CSOP. The submitted offer is transmitted to the S/36 where it becomes a contract for 10 to 15 years and receives annual payments.

The type of data is signup specific and includes producer's personally identifiable information, and information about acres, crop history, practices, soils and participant submission. Some of this information is obtained from web services such as Crop, Crop List, Compliance, Farm Records and SCIMS.

CSOP processing includes the data entry into the CSOP application, the update of the Conservation database and the transmission of the data to the S/36 (or manually entered into the S/36 CRP system) and the creation of the contract on the S/36. Contract maintenance is done on the S/36 and annual payments are made on the S/36. The roles of users are county, state and national FSA employees. The number of users is approximately 3200.

2.2.1.1.4 State Acres for Wildlife Enhancement (SAFE)

The State Acres for Wildlife Enhancement or SAFE projects help state and regional agencies, non-profit organizations and others address local wildlife objectives through habitat restoration. FSA approves SAFE proposals to address state and regional high priority wildlife objectives. Conservation practices currently offered under CRP are fine-tuned through SAFE to improve, connect or create



higher-quality habitat to promote healthier ecosystems in areas identified as essential to effective management of high priority species. SAFE, like other continuous CRP practices, targets CRP acres to the most environmentally sensitive land and establishes the highest value conservation practices on generally smaller acreages.

The flow of the process for the State Acres for Wildlife Enhancement (SAFE) sub-component includes county employees who begin the process as they enter offer information into SAFE. The producer accepts and signs the appropriate forms and the county employee enters the acceptance into SAFE where the submitted offer becomes a contract for 10 to 15 years. Contract maintenance and payments are accomplished through the web while payment information is transmitted to the S/36 for payment limitation purposes.

The type of data is signup specific and includes producer's personally identifiable information, and information about acres, crop history, practices, soils and participant submission. Some of this information is obtained from web services such as Crop, Crop List, Compliance, Farm Records and SCIMS. Data can be loaded from GIS XML scenarios but this data may not be modified later. Conservation Eligibility Area information is also included.

COLS SAFE processing includes the data entry into the SAFE application, the update of the Conservation database, and the creation of the contract. The roles of users are county, state and national FSA employees. The number of users is approximately 3200.

2.2.1.1.5 Sign-up Configuration

Authorized National employees configure each new signup with specific signup information. This includes information such as the signup number, practices, the number of years of payments, the maximum payment rates, etc.

The flow of the process includes a National employee entering the signup specific information into the Signup Configuration sub-component where the information is saved to the Conservation database.

The type of data is signup specific and includes Signup Number, State and Counties, program year(s), maximum payment rate, maintenance rate, HUC codes, EBI information, and N factors.

Signup Configuration processing includes the data entry into the Signup Configuration application and the update of the Conservation database. The roles of users are national FSA employees. The number of users is approximately 6 who are the employees of the Conservation and Environmental Programs Division's Conservation Assistance Branch.

2.2.1.2 Soils Database Management System (SDMS)

The Soils Database Management System (SDMS) is an intranet Web based component of CRP that is hosted on the FSA Web Farm. This application is accessed by FSA and NRCS personnel to add, edit, void and view a National Soils database. Access to the system is needed 7 days a week and 24 hours a day. Soil information recorded in this application is used by other CRP applications to determine eligibility and to calculate payments.

The flow of process begins with authorized FSA and NRCS employees who update or add soils information to the database. County employees then use Conservation applications that use the soils data from the Soils Database. County employees also download soils information in a text file, modify the text file, and email the text file to National users who verify the information and request Kansas City developers to update the Soils Database.



The type of data is limited to soils information. SDMS processing includes the update of the Soils Database. The roles of users are FSA county, state and national employees and NRCS employees. The number of users is approximately 3400.

2.2.1.3 CRP Contracts

CRP Contracts is the CRP component on the S/36 that allows county employees to do contract maintenance and make payments to CRP contracts. The offers on the COLS system for REX, GSOP, and CSOP are transmitted to the S/36 where they become contracts.

The process flow includes county employees who maintain the CRP contracts, and create contracts from offers transmitted to the S/36. County employees also make payments for CRP contracts and print reports concerning CRP contracts. Contracts can be added, deleted, revised, corrected, extended, and cancelled.

The type of data includes Conservation data. The type of data is signup specific and includes producer's personally identifiable information, and information about acres, crop history, practices, farm, and soils.

Processing provided includes the manual data entry into the CRP Contract S/36 application, the modification and update of contract data, the payment of contracts and the printing of reports with conservation information. The roles of users are county employees and the number of users is approximately 3200.

2.2.1.4 Conservation Legacy Upload

The Conservation Legacy Upload application is a CRP component that includes transmitting S/36 transaction data through the MQ Series messaging and queuing software to the Data Transfer Service (DTS), and then to the Conservation database. If the transaction data is less than 4 megabytes, the DTS process is bypassed. Some of the data is transmitted immediately and some is transmitted at the end of the day.

The process flow includes transactions such as adds, deletes, and changes being made on the CRP Contracts application. These transactions are recorded in a transaction file that is transmitted through the MQ Series process to the DTS and then to the Conservation database. In some cases the DTS process is bypassed.

The type of data includes conservation data for the contracts and payments. Processing provided includes the manual data entry into the CRP Contracts application, the modification and update of contract data, the payment of contracts, and the printing of reports with Conservation information, which results in a transmission being made to the MQ Series process then to the DTS and then to the Conservation Database. The roles of users are county employees. The number of users is approximately 3200.

2.2.1.5 Emergency Forestry Conservation Reserve Program (EFCRP)

USDA Farm Service Agency's (FSA) Emergency Forestry Conservation Reserve Program (EFCRP) helps eligible landowners and operators restore and enhance forestland damaged by 2005 hurricanes Dennis, Katrina, Ophelia, Rita and Wilma. Trees planted through EFCRP help reduce flood effects, protect water sources, decrease soil erosion and improve wildlife habitat. Owners of land must have experienced at least a 35 percent loss of merchantable timber in one of 261 counties receiving primary presidential or secretarial disaster designations caused by the hurricanes.



The EFCRP is a CRP component hosted on the internal web that allows the applicable county offices to enter and maintain EFCRP offer data, allows state offices to view all EFCRP offers for their state, allows national level personnel to view all EFCRP offers for all states and to do analysis of those offers, and allows national employees to enter and maintain the national program settings for EFCRP general offers.

The flow of the process begins as county employees enter producer's bid information into EFCRP. The bids are ranked and letters of acceptance are sent to producers. The producer accepts and signs the appropriate forms and the county employee enters the acceptance into the EFCRP. The offers become contracts for 10 to 15 years and producers receive lump sum or annual payments.

The type of data is signup specific and includes producer's personally identifiable information, and information about acres, crop history, practices, forestry data, and participant submission. Some of this information is obtained from web services such as Crop, Crop List, Compliance, Farm Records and SCIMS.

EFCRP processing includes the data entry into the EFCRP application, the update of the Conservation database, contract creation and maintenance, and contract payments by lump sum or annual payments.

The roles of users are county, state and national employees and the number of users is approximately 3200.

2.2.2 Emergency Conservation Program (ECP)

The Emergency Conservation Program (ECP) provides emergency funding and technical assistance for farmers and ranchers to rehabilitate farmland damaged by natural disasters and for carrying out emergency water conservation measures in periods of severe drought.

This minor application was originally a part of the Conservation Reporting & Evaluating System and has since been removed and is being rewritten to be accessed through the internal web.

Through the modernization of this system, cost share and payments for ECP that are currently tracked in CRES on the System 36 will be supported almost entirely on a web-based platform. Major functions of the system will control process flow, maintain records, and control and disburse funds. The process flow of the program may be summarized briefly as offer making, offer evaluation, offer selection, contract approval, contract payments, and contract maintenance.

The system will store sufficient records for program management and evaluation by local, State, and National Office FSA. Because the program will be strictly limited by available funds, the system will control funds with both an internal ledger system to manage anticipated and actual obligations and will communicate with the FMD National Payment System to record obligations and make payments.

The type of data includes the type of disaster, disaster description, eligible practices, eligible states and counties, date of disaster, estimated acres affected by the disaster, estimated number of farms affected, type of livestock affected, number of livestock affected, types of crops affected, crop production loss, estimate of funds needed, other programs requested for disaster, affects to wetlands, floodplain and/or historic sites, maximum cost share percentages, and producer personal identifiable information.

Processing provided will include offer making, offer evaluation, offer selection, contract approval, contract payments, and contract maintenance. The roles of users are county, state and national FSA employees. The number of users will be approximately 3200.



2.2.3 Conservation Reporting & Evaluation System (CRES)

Conservation Reporting and Evaluating System Program (CRES) offers financial and technical help to assist eligible participants install or implement structural and management practices on eligible agricultural land. CRES is a minor application of the Conservation System.

The process flow begins as a county office employee creates an application for the producer in the CRES system. The producer accepts and signs the AD-245 form, Request for Cost-Shares. The County Office Committee (COC) reviews the request and determines the cost-share amount they are willing to approve. The AD-862 (CRES contract) is referred to the applicable technical service provider for approval. An approval letter is then sent to the producer. The county office employee enters the needs determinations data from the approved CRES contract into the system along with the approval data. Performance is recorded and payments are generated to the producer.

The type of data is contract specific and includes basic information for producer, program data, practice data, component data, and performance data.

Processing provided includes application creation, application evaluation, application approval, and payments. The roles of the users are county, state and national and the number of users is approximately 3200.

2.2.4 Grassland Reserve Program (GRP)

The Grassland Reserve Program (GRP) is a voluntary program offering landowners the opportunity to protect, restore, and enhance grasslands on their property. GRP offers financial and technical help to assist eligible participants install or implement structural and management practices on eligible agricultural land. GRP is considered a minor application.

The process flow begins with a county office employee who creates a CCC-920, Grassland Reserve Program Contract. If an easement is involved, the County Office Committee approves the easement through the AD-1153 and the contract through the CCC-920. The producer and a CCC representative must sign the CCC-920 form. County office employees create 1245s (Practice Approval and Payment Application) for all technical practices on the approved AD-1153s for easements or approved CCC-920s. Performance is recorded on the 1245s and payments are generated to the producer.

The type of data is contract specific and includes basic information for producer, multi-participant data, tract information, technical practice data, and multi-farm data.

Application processing includes contract or easement creation, contract or easement evaluation, contract or easement approval, practice approval, performance recording and payment generation. The roles of the users are county, state and national. The number of users is approximately 3200.

2.2.5 CORVID

CORVID is a knowledge automation expert system development tool commercial off-the-shelf (COTS) product purchased from Exsys, Inc. It is a general purpose tool used to build many types of systems for helping employees and customers solve problems, supporting and expanding the expertise of business advisors, or providing problem-solving answers throughout an enterprise. It also provides run-time environment to execute the business rules and present the appropriate interface to the user for interaction. CORVID is considered a minor application.

CORVID provides environmental resource specific information for web-based training modules like AGLEARN, and an expert system advisor via the Intranet. CORVID provides 'real-time' access to expert knowledge and recommendations which allow users to more accurately complete the necessary



components required for an environmental review. This enables a faster, better targeted and more accurate environmental review process. It also allows FSA users to focus more time on the implementation of programs and less time determining the proper type and scope of environmental review for program actions.

The flow of the CORVID process includes county employees accessing the CORVID (COTS) application and selecting Conservation Programs for either ECP or CRP. Questions are answered yes or no concerning the types of ECP or CRP projects, the location of the project, whether project will affect historic properties on tribal lands, entering producer's name, phone number, email address, date and a statement about what is proposed and why. The above information is then printed and given to the producer.

The type of data is ECP or CRP proposed projects and the producers name, phone number and email address. CORVID processing includes the data entry into the CORVID COTS package and a report of that data. No data is saved. The roles of users are county employees and the number of users is approximately 3200.

2.3 System Categorization

By following the guidance set forth in NIST SP 800-60 and FIPS PUB 199 taking into account the information types and other factors for this system, the Security Categorization for this system has been determined to be **Moderate**. Therefore, Risk Assessments and Security Testing and Evaluation (ST&E) will be performed following the Moderate baseline set forth in NIST SP 800-53 Annex 2.

2.4 Responsible Organization

United States Department of Agriculture (USDA)
Farm Service Agency (FSA)
1400 Independence Avenue SW
Washington, D.C. 20250

This system is maintained by:

Farm Service Agency
FSA/DAM/ITSD/ADC/PSCAO
6501 Beacon Drive
Kansas City, MO 64133

This system's hardware is located at:

- Mainframe
IBM Z/800
OCIO/NITC
8930 Ward Parkway
Kansas City, MO 64110
- RS/6000 Intel-based servers
OCIO/ITS/IOD/HOB
8930 Ward Parkway
Kansas City, MO 64110
- Intel-based web servers



OCIO/ITS/IOD/HOB
8930 Ward Parkway
Kansas City, MO 64110

- IBM AS/400 County Office platform and workstations - nationwide

2.5 Information Contacts

Name	Title	Address	Phone Number	E-mail Address
Certifying Officer: Sue Bussells	FSA Chief Information Officer (Acting) Director, Information Technology Services Division (ITSD) (Acting) FSA/DAM/ITSD	U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington D.C. 20250	(202) 720-5320	sue.bussells@wdc.usda.gov
Business Owner (DAA): Robert Stephenson	Director, Conservation and Environmental Programs Division USDA/FSA/DAFP/CEPD	U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington D.C. 20250	202-720-6221	robert.stephenson@wdc.usda.gov
Information Owner: Charles "Michael" Boyles	Manager, Price Support & Commodity Applications Office (PSCAO) FSA/DAM/ITSD/ADC/PSCAO	U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133	816-926-1905	mike.boyles@kcc.usda.gov
Information System Owner: Eric Will	Branch Chief, Conservation Special Systems Group (CSSG) FSA/DAM/ITSD/ADC/PSCAO/CSSG	U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133	816-926-2664	eric.will@kc.usda.gov
User Representative: Martin Lowenfish	DAFP/CEPD/CAB	U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington D.C. 20250	202-720-3265	martin.lowenfish@wdc.usda.gov

2.6 Assignment of Security Responsibility

Name	Title	Address	Phone Number	E-mail Address
Privacy Act Officer: Karen Malkin, ESQ	Chief Privacy Act Officer USDA/FSA/OA	U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250	202-690-2203	karen.malkin@wdc.usda.gov
Freedom of	Associate	U.S. Department of Agriculture	202-690-0153	tom.hofeller@wdc.usda.gov



Privacy Impact Assessment for The Conservation System (CS)



Name	Title	Address	Phone Number	E-mail Address
Information Act (FOIA) Coordinator: Thomas B. Hofeller, Acting	Administrator for Operations and Management USDA/FSA/OA	Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250		
Information System Security Program Manager (ISSPM): Brian Davies	Information Security Office (ISO) USDA/FSA/DAM/ITSD/ OTC/ISO	U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250	202-720-2419	brian.davies@wdc.usda.gov
Disaster Recovery Coordinator: Mindy Gehrt	Information Security Office (ISO) USDA/FSA/DAM/ITSD/ OTC/ISO	U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133	816-926-3522	mindy.gehrt@kcc.usda.gov
Certification & Accreditation Coordinator: Georgia "Shelly" Nuessle	Information Security Office (ISO) USDA/FSA/DAM/ITSD/ OTC/ISO	U.S. Department of Agriculture Farm Service Agency 6501 Beacon Drive Kansas City, MO 64133	816-926-3018	georgia.nuessle@kcc.usda.gov

3 USDA Privacy Impact Assessment

3.1 Does the System Contain Information About Individuals in an Identifiable Form?

QUESTION 1 Does the system contain any of the following type of data as it relates to individuals:	Yes		No
	Citizens	Employees	
Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social Security Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Telephone Number	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Email address	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Street address	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health data	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biometric data	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
QUESTION 2 Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.? NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code ¹	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are social security numbers embedded in any field?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is any portion of a social security numbers used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are social security numbers extracted from any other source (e.g. system, paper, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If all of the answers in Questions 1 and 2 are NO, 

You do not need to complete a Privacy Impact Assessment for this system and the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets,

¹ Comments of Latanya Sweeney, Ph.D., Director, Laboratory for International Data Privacy Assistant Professor of Computer Science and of Public Policy Carnegie Mellon University To the Department of Health and Human Services On "Standards of Privacy of Individually Identifiable Health Information". 26 April 2002.



Part 7, Section E, Question 8c is:

3. No, because the system does not contain, process, or transmit personal identifying information.

If any answer in Questions 1 and 2 is YES, provide complete answers to all questions below.



3.1.1 Data Collection

1. Generally describe the data to be used in the system.

- **Customer:** Structure of business ventures and conservation program information is collected.
- **Other:** Location of land is the data collected.

2. 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

3. Sources of the data in the system.

3.1. What data is being collected from the customer?

Conservation program information is collected from the customer.

3.2. What USDA agencies are providing data for use in the system?

The FSA and NRCS provide practice information, business structure, and payment limitations.

3.3. What state and local agencies are providing data for use in the system?

None.

3.4. From what other third party sources is data being collected?

Third party sources include technical service providers and farm management consultants.

4. Will data be collected from sources outside your agency? For example, customers, USDA sources (e.g. NFC, RD, etc.) or Non-USDA sources.

- Yes
 No. If NO, go to section 3.1.2, question 1.

4.1. How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?

Internal validation checks are used to verify data for accuracy, relevance, timeliness, and completeness.

4.2. How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?

Data is handled through NRCS (TSP).

4.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?



Internal validation checks are used to verify data for accuracy, relevance, timeliness, and completeness.

3.1.2 Data Use

- 1 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?

The data is used as a filtering key internally.

- 2 Will the data be used for any other purpose?

- Yes
 No. If NO, go to question 3 (below).

2.1 What are the other 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 Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (e.g. aggregating farm loans by zip codes in which only one farm exists.)?

- Yes
 No. If NO, go to question 5 (below).

4.1 Will the new data be placed in the individual's record (customer or employee)?

- Yes
 No

4.2 Can the system make determinations about customers or employees that would not be possible without the new data?

- Yes
 No

4.3 How will the new data be verified for relevance and accuracy?

Field spot checks (10% annually) are performed.

- 5 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?



Conservation Program Information is the intended use of all data being collected.

6 Will the data be used for any other uses (routine or otherwise)?

- Yes
- No. If NO, go to question 7 (below).

6.1 What are the other uses?

7 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 8 (below).

7.1 What controls are in place to protect the data and prevent unauthorized access?

8 Are processes being consolidated?

- Yes
- No. If NO, go to section 3.1.3, question 1.

8.1 What controls are in place to protect the data and prevent unauthorized access?

3.1.3 Data Retention

1 Is the data periodically purged from the system?

- Yes
- No. If NO, go to question 2 (below).

1.1 How long is the data retained whether it is on paper, electronically, in the system or in a backup?

All data in the system is maintained indefinitely.

1.2 What are the procedures for purging the data at the end of the retention period?

N/A

1.3 Where are these procedures documented?



N/A

- 2 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?

Nightly backups and archives are performed. Closed/expired contracts cannot be altered. Audit trails are maintained.

- 3 Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

- Yes
 No

3.1.4 Data Sharing

- 1 Will other agencies share data or have access to data in this system (e.g. international, federal, state, local, other, etc.)?

- Yes
 No. If NO, go to question 2 (below).

1.1 How will the data be used by the other agency?

1.2 Who is responsible for assuring the other agency properly uses of the data?

- 2 Is the data transmitted to another agency or an independent site?

- Yes
 No. If NO, go to question 3 (below).

2.1 Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

- 3 Is the system operated in more than one site?

- Yes
 No. If NO, go to section 3.1.5, question 1.

3.1 How will consistent use of the system and data be maintained in all sites?

The centralized distribution of applications is used to ensure the consistent use of system data. Software is the same at all sites.



3.1.5 Data Access

- 1 Who will have access to the data in the system (e.g. users, managers, system administrators, developers, etc.)?

County, State, and National employees plus System Administrators have access to the data in the system.

- 2 How will user access to the data be determined?

Role-based and tiered access - County employees can see county information, State can see state data, and National spans across the entire system.

- 2.1 Are criteria, procedures, controls, and responsibilities regarding user access documented?

- Yes
 No

- 3 How will user access to the data be restricted?

Role-based and tiered access is used to restrict access to data.

- 3.1 Are procedures in place to detect or deter browsing or unauthorized user access?

- Yes
 No

- 4 Does the system employ security controls to make information unusable to unauthorized individuals (e.g. encryption, strong authentication procedures, etc.)?

- Yes
 No

3.1.6 Customer Protection

- 1 Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (e.g. office, person, departmental position, etc.)?

Robert Stephenson, Director, Conservation and Environmental Programs Division

- 2 How can customers and employees contact the office or person responsible for protecting their privacy rights?

Robert Stephenson
Director, Conservation and Environmental Programs Division
USDA/FSA/DAFP/ CEPD
U.S. Department of Agriculture
Farm Service Agency



1400 Independence Avenue SW
Washington D.C. 20250
(202) 720-6221
robert.stephenson@wdc.usda.gov

3 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 4 (below).
 No

3.1 If NO, please enter the POAM number with the estimated completion date:

- 4 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 5 (below).

4.1 Explain how this will be mitigated?

5 How will the system and its use ensure equitable treatment of customers?

Internal controls are applied consistently without respect of race, gender, nationality, or location. There are limited actionable choices.

6 Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

- Yes
 No. If NO, go to section 3.1.7, question 1.

6.1 Explain

3.1.7 System of Record

1 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 section 3.1.8, question 1.



- 1.1 How will the data be retrieved? In other words, what is the identifying attribute (e.g. employee number, social security number, etc.)?

Data is retrieved via a generated identifier number.

- 1.2 Under which Systems of Record notice (SOR) does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov)

USDA/FSA-2 – Farm Records File (Automated)

- 1.3 If the system is being modified, will the SOR require amendment or revision?

No.

3.1.8 Technology

- 1 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.

- 1.1 How does the use of this technology affect customer privacy?

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/CYBER SECURITY



4 Privacy Impact Assessment Authorization Memorandum

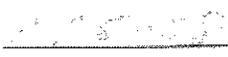
I have carefully assessed the Privacy Impact Assessment for the
Conservation System (CS)

This document has been completed in accordance with the requirements of the EGovernment 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.



Charles Michael Boyles
Information Owner



Date



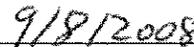
Sue E. Busselis
Agency CIO (Acting)



Date



Brian Davies
Information System Security Program Manager (ISSPM)



Date