

# Privacy Impact Assessment for

## Natural Resource Manager (NRM)

Policy, E-Government and Fair Information Practices

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## Abstract

The Natural Resource Manager (NRM) is a General Support System (GSS) which is an “interconnected set of information resources under the same direct management control which shares common functionality.”

All application components reside on Digital Infrastructure Services Center (DISC) Platform as a Service (PaaS) servers that are owned, managed, and maintained by the Midrange Systems under the Service Level Agreement (SLA).

PIA is being conducted for the NRM as required by the outcome of the NRM Privacy Threshold Analysis (PTA).

## Overview

The Natural Resource Manager (NRM) is a General Support System (GSS) which is an “interconnected set of information resources under the same direct management control which shares common functionality.” All application components reside on United States Department of Agriculture (USDA) Digital Infrastructure Services Center (DISC) Platform as a Service (PaaS) servers that are owned, managed, and maintained by Midrange Enterprise Data Center (EDC) under the Managed-level Service Level Agreement (SLA).

The applications reside on servers that are owned and managed USDA DISC Midrange Systems under a Service Level Agreement (SLA). The NRM stores all data in a centralized database located at DISC Midrange Enterprise Data Center (EDC) in Kansas City, MO. The NRM is scalable and provides nationally consistent storage, access, reporting, and analytical capabilities for essential Forest Service inventory and business needs.

The NRM leverages the USDA Identity, Credential, and Access Management (ICAM) eAuthentication in conjunction with a commercial-off-the-shelf (COTS) Oracle Single Sign-On (SSO) application called Oracle Internet Directory (OID) and a tailored COTS Oracle User Management Application (UMA) and Authorization Management Tool (AMT) that automates and distributes the account management process, including user registration and management approval, oversight, and authorization processing to hosted application users and managers.

The NRM includes several application suites: Infrastructure (INFRA), Timber Information Manager (TIM), Forest Service Activity Tracking System (FACTS), and Natural Resource Information System (NRIS) each of which have several component applications. Applications are referred to as NRM – Grants & Agreements, NRM – Minerals, NRM – Range, NRM – Wildlife, etc. There are over 70 NRM applications.



The NRM's single, centralized database offers more efficient data usage for both field users and Forest Service decision makers. When the data currently included in the NRM was stored on many separate databases across the country, the information was not easy to retrieve by others outside that particular Forest or Region. Although valuable, that data essentially began and ended its life cycle in that local office. The Corporate Data Warehouse (CDW) was created to provide a central, nationwide data repository, but maintaining the CDW is an additional data management layer. With all data stored in one system at the DISC, data is much more accessible. Field users can more easily compare their data to that of neighboring Districts/Forests/Regions, and agency decision makers can more efficiently view trends and plan accordingly.

NRM has five applications that display PII: Grants and Agreements (G&A), Minerals Materials (MM), Range, Special Uses Data System (SUDS), and Timber Information Manager (TIM).

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## 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 Identification

What information is collected, used, disseminated, or maintained in the system?

NRM collects information about the following types of corporate information, Aquatic Surveys, Geology, Invasive species, Rangeland inventory and Monitoring, Recreation, Potential natural vegetation, Soil, Terrestrial Ecosystem Unit Inventories, Threatened and Endangered Plants, Vegetation, Watershed Improvements, Water Uses Tracking, Wildlife, Forest Products Permits Timber Sale Contracts, Timber Sale Accounting, Data Management, Activities (Invasive Species Treatment, KV/BD Processing, Silviculture, Fire Planning and Accomplishment, Fuels), Grants and Agreements, Heritage and Heritage Assemblages, Range Allotments and Permitting, Dams, Buildings, Land Units, Minerals & Geology, Recreation Sites, Roads, Special Uses, Trails, Wastewater Systems, Water Systems, Water Sampling, Bridges, Mining (Permits), Wilderness, Wild and Scenic Rivers, and Visitor Use Permits.

Of the information areas collected above, only the following NRM applications use PII data: Grants and Agreements (G&A), Minerals Materials (MM), Range, Special Uses Data System (SUDS), and Timber Information Manager (TIM). The PII data for these applications is stored in one NRM application called NRM-Contacts. It is in this application where the PII data is protected, encrypted and only available to authorized personnel.

The following PII is what is required by law or policy for the applications:

Grants and Agreements: Cooperator Name, Address, Vendor ID (may be one of the following: Employer Identification Number (EIN), Social Security Number (SSN), Taxpayer Identification Number (TIN) depending on how the entity registered their Data Universal Numbering System (DUNS) in the System for Award Management (SAM), Federal Award Identifying Number (FAIN) or agreement number.

Minerals Materials: Name Address, phone/Fax (optional), Email (optional).

Range: Name Address Phone/Fax, email

Special Uses Data System: Name Address Phone/Fax, email



Timber Information Manager: Name Address Phone/Fax email, Employer Identification Number (EIN), Social Security Number (SSN), Taxpayer Identification Number (TIN).

## 1.2 Source

What is the source(s) of the information in the system?

Grants and Agreements

- USDA Employees
- USDA Financial Management Modernization Initiative (FMMI)
- USDA Grant Information Management (GIM)
- FS Central Repository System (CRS)

Minerals Materials:

- USDA Employees
- USDA FMMI
- FS CRS

Range:

- USDA Employees
- USDA FMMI
- FS CRS

Special Uses Data System:

- USDA Employees
- USDA FMMI
- FS CRS

Timber Information Manager:

- USDA Employees

- USDA FMMI
- FS CRS

### **1.3 Justification**

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

Meet legal or policy requirements. Ex: DATA Act reporting or populate contract with person/company name, etc.

Make payments to the person/company for work done

Ensure the Forest Service (FS) is getting enough information to make an informed decision on the award of work to be done.

Check on the validity/work record of a person/company that is looking to provide work or procure a product from FS lands.

Ensure the FS is getting sufficient information to make an informed decision for NEPA to be completed and whether or not to issue an authorization for use of NFS lands.

Inventory and mitigation of abandoned mines and associated environmental and human health & safety risks

Bill person/company for product purchased

Manage limits on per person sales of forest products

Enforce validity of forest product purchase or product removal

### **1.4 Collection**

How is the information collected?

Grants and Agreements:

- Collected from users and inputted by FS Employee via web-based application.
- FMMI interface connection
- GIM interface connection
- CRS interface

**Minerals Materials:**

- Collected from users and inputted by FS Employee via web-based application.
- FMMI interface connection
- CRS interface

**Range:**

- Collected from users and inputted by FS Employee via web-based application.
- FMMI interface connection

**Special Uses Data System:**

- Collected from users and inputted by FS Employee via web-based application.
- FMMI interface connection

**Timber Information Manager:**

- Collected from users and inputted by FS Employee via web-based application.
- FMMI interface connection

## 1.5 Validation

How will the information be checked for accuracy?

Grants & Agreements - Validations are performed against System for Award Management (SAM) and Financial Management Modernization Initiative (FMMI)

Mineral Materials - Front Liner and/or Mineral Administrator reviews information

Range - Information collected from the business entity applying for a permit is reviewed by the resource specialist by comparing all documentation provided. If questions arise the information can be further verified through state and county offices





Special Uses (SUDS) - Accuracy of the business entity applying for an authorization is done by using Secretary of State web sites and audits. References are used when the applicant has authorizations on other federal land.

Timber Information Manager (TIM) - The information collected in person is reviewed by the Front Liner.

## 1.6 Authority

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

Grants and Agreements:

Various ones may apply depending on the grant or agreement, the following is a list that is applicable:

Department of Interior and Related Agencies Appropriation Act of 1992, Pub. L. 102-154

Cooperative Funds Act of June 30, 1914 (16 U.S.C. 498 as amended by Pub. L. 104-127)

Secure Rural Schools and Community Self-Determination Act of 2000, Public Law 106-393, 16 U.S.C. 500, as reauthorized and amended by the Emergency Economic Stabilization Act of 2008, Energy Improvement and Extension Act of 2008, and Tax Extenders and Alternative Minimum Tax relief Act of 2008, Section 601(a) in division C of Pub. L. 110

Cooperative Funds and Deposits Act of December 12, 1975, Pub. L. 94-148, 16 U.S.C. 565a1 – a3, as amended by the Consolidated Appropriations Act of 2008, Pub.L. 110-161, and the Omnibus Public Land Management Act, Pub.L. 111-11, Sec. 3001

Wyden Amendment, Section 323(a) of the Department of Interior and Related Agencies Appropriations Act, 1999, as included in Pub.L. 105- 277, Div. A., Section 101 (e), as amended by Pub.L. 109-54, Sec. 434, and the Omnibus Public Land Management Act, Pub.L. 111-11, Sec. 3001

Cooperative Forestry Assistance Act of 1978, P.L.95-313

Cooperative Law Enforcement Act of 1971, P.L.92-82

Economy Act of 1932, P.L.97-258



Farm Bill of 1985 (Food Security Act), P.L.99-198

Federal Technology Transfer Act of 1986, P.L.96-480

Forest and Rangeland Renewable Resources Research Act of 1978, P.L.95-307

Granger- Thy Act of 1950, P.L.81-478

Intergovernmental Cooperation Act of 1968, P.L.90-577

International Forestry Cooperation Act of 1990, P.L.101-513

Lake Tahoe Restoration Act, P.L.106-506

National Agricultural Research, Extension, and Teaching Act of 1977, P.L.95-113

National Forest Roads and Trails Act of 1964, P.L.88-657

Reciprocal Fire Act of 1955, P.L.84-46

National Forest Foundation Act, Nov. 16, 1990, Title IV, As Amended by P.L. 103-106-Oct. 12, 1993, P.L.101-593Interior and Related Agencies Appropriation Act of 2005, P.L.108-447

Title 42, USC 231: Department of Health and Human Services - Service and Supply Fund. 42 USC 231

Sikes Act of September 15, 1960 74 Stat. 1052, as amended. P.L.86-797

Title 15, USC Section 3710(e)(7)(A), Utilization of Federal Technology, 15 USC 3710

23 USC 204, Highways Federal Lands Highway Program, P.L.109-59

#### Minerals Materials:

The Secretary of Agriculture has the statutory authority to dispose of petrified wood and common varieties of sand, stone, gravel, pumice, pumicite, cinders, clay, and other similar materials on lands administered by the Forest Service. That authority derives, in part, from:

Title 36, Code of Federal Regulations, Part 228, Subpart C. This subpart sets the policy and standards for the disposal of mineral materials. The regulations also set forth standards for the protection of National Forest Lands affected by mineral material activities

Mineral Materials Act of July 31, 1947, 30 U.S.C. 601-604. The Act provides for disposal of mineral materials

Multiple Surface Use Act of July 23, 1955 (aka Common Varieties Act of 1955, Surface Resources Act of 1955) 30 U.S.C. 611-15. This amended the 1947 Act and became the authority for disposal of common variety minerals unless the deposit has some property giving it a distinct and special value. The Act gives the Secretary of Agriculture disposal authority.

The Multiple-Use Mining Act of 1955 (30 U.S.C. 601-604, 611-615), which amended the Materials Act of 1947 to permit disposal from National Forest System lands reserved from the public domain.

The authority to dispose of mineral materials from lands acquired under the authority of the Weeks Act of 1911 (36 Stat. 961) stems from the Act of March 4, 1917 (16 U.S.C. 520).

The Secretary of Agriculture's authority by the Act of June 11, 1960 (74 Stat. 205) and by the Act of September 2, 1958 (16 U.S.C. 521a).

Regulations at 36 CFR 228, Subpart C establish the policy and standards for the disposal of mineral materials. The regulations also set forth standards for the protection of National Forest lands affected by mineral material activities.

Range:

All personal information is requested on a voluntary basis; however, if you do not provide this personal information, your application will not be accepted and the permit will not be granted to you. Solicitation of this information is necessary for the government to conduct its permit program and thus is authorized under the National Forest Management Act of 1976, (16 USC 472a).

Wyden Amendment, Section 323(a) of the Department of Interior and Related Agencies Appropriations Act, 1999, as included in Pub.L. 105- 277, Div. A., Section 101 (e), as amended by Pub.L. 109-54, Sec. 434, and the Omnibus Public Land Management Act, Pub.L. 111-11, Sec. 3001.

Special Use Data System (SUDS):

Certain data collection is required by law or regulation. Other data may be optional. The following current statutory authorities govern the issuance and administration of special-use authorizations on National Forest System lands, including the collection of applicant's personal information:

The Mineral Leasing Act of 1920, as amended on November 16, 1973, (30 U.S.C. 185(1)). This act authorizes the issuance of permits and easements for oil and gas pipelines.

Title V, Federal Land Policy and Management Act of October 21, 1976, (43 U.S.C. 1761-1771). Title V of the Federal Land Policy and Management Act (FLPMA) authorizes the Secretary of Agriculture to issue permits, leases, or easements to occupy, use, or traverse National Forest System lands.

The following regulations provide direction for special uses management on National Forest System lands:

Title 36, Code of Federal Regulations, Part 251, Subpart B. This subpart provides direction for special uses management on National Forest System lands, including guidance pertaining to the special-use application process, terms and conditions of use, and permit administration.

Title 36, Code of Federal Regulations, Part 251, Subpart D. This subpart governs procedures by which landowners may apply for access across National Forest System lands.

Title 36, Code of Federal Regulations, Part 251, Subpart E. This subpart implements section 1307 of the Alaska National Interest Lands Conservation Act with regard to the granting of a preference to local residents and certain Native Corporations to obtain special use authorizations for visitor services provided on National Forest System lands within Conservation System Units of the Tongass and Chugach National Forests in Alaska.

Timber Information Manager (TIM):

All personal information is requested on a voluntary basis; however, if you do not provide this personal information, your bid will not be accepted and the contract will not be awarded to you. Solicitation of this information is necessary for the government to conduct its sale program and thus is authorized under the National Forest Management Act of 1976, (16 USC 472a).

## **1.7 Risk Mitigation**

Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Unauthorized access is gained to the system or to the database content that stores NRM PII data. Existing access controls prevent unauthorized modification of data, and in some instances, data is no longer available for modification based on process (it is locked). Roles are tested to ensure that they can only get to the data that they are intended to be given access to.



PII data is inadvertently viewed on a user's screen. The data is encrypted in the database and masked when displayed on a screen.

Paper copies that contain PII information may be accessible to personnel at the sight collected. All audits and proprietary information collected for fee and gross fixed asset determination are required to be stored in a locked cabinet when not in use.

When PII data is electronically transferred to non-NRM systems such as FMMI it might be accessible. Data is encrypted (using secure ftp) before transfer. FMMI information safeguards are in place.

When PII is printed from NRM systems, there are user procedures in place for handling the information sent to the printers. Data is required to be retrieved immediately for safe storage.

NRM PII data can be downloaded in reports/queries and stored on other systems not listed. Very few reports allow this, and employees are required to take annual ethics IT security courses that detail the prohibitions for this behavior.

## 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 Usage

Describe all the uses of information.

Use in this context refers to routine uses, or those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act. Routine use disclosures are not mandatory.

They are optional disclosures made at the discretion of the appropriate Privacy Act System Manager or designee. Nevertheless, FS must keep an accounting of all disclosures made pursuant to a routine use on a disclosure accounting record such as the System of Records Notice or this PIA. Routine Uses are agreements for sharing personal information with:

The Department of Treasury or another Federal agency conducting financial assessment, collection and payments (such as Treasury offset for debt collection for TSRM permits)

The Department of Justice (including United States Attorney Offices) or another Federal agency conducting litigation or in proceedings.

To a congressional office in response to an individual's request.

To the National Archives and Records Administration or an authority of 44 U.S.C. §§ 2904 and 2906.

Federal Funding Accountability and Transparency Act (FFATA) as amended by the Digital Accountability and Transparency Act (DATA) Act Reporting requires posting to USAspending.gov (Grants and Agreements Application).

To contractors and their agents, grantees, experts, consultants, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for FS, when necessary to accomplish an agency function related to this system of records. Individuals provided information under this routine use are subject to the same Privacy Act requirements and limitations on disclosure as are applicable to FS officers and employees.

To the news media and the public, in consultation with counsel, when there exists a legitimate public interest in the disclosure of the information or when disclosure is necessary to preserve confidence in the integrity of FS or is necessary to demonstrate the accountability of FS's officers, employees, or

individuals covered by the system, except to the extent it is determined that release of the specific information in the context of a particular case would constitute an unwarranted invasion of personal privacy.

To appropriate agencies, entities, and persons when: FS suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; The Department has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of this system or other systems or programs (whether maintained by the Department or another agency or entity) or harm to the individual that rely upon the compromised information; and the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the Department's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm<<Enter RESPONSE TEXT or N/A here as appropriate>>

## **2.2 Analysis and Production**

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

The following tools are used to provide data for user analysis:

User Views (specific data can be downloaded from these views and analyzed by any tool available to the user, not by NRM)

Database queries (specific data can be downloaded via these queries and analyzed by any tool available to the user, not by NRM)

Reports (specific data can be downloaded from these reports and the data extracted for analysis by any tool available to the user, not by NRM)

## **2.3 Commercial/Public Use**

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

Grants & Agreements: System for Award Management (SAM) is used to validate Data Universal Numbering System (DUNS) or Unique Entity Identifier (UEI) registration.

Mineral Materials: N/A

Range: N/A

Special Uses (SUDS): N/A

TIM: N/A

## **2.4 Risk Mitigation**

Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

The following are used to protect PII data stored and transmitted by NRM:

Use of Oracle Obfuscation to mask PII data stored in the NRM database. It can only be unmasked by Forest Service (FS) personnel who have the proper access to see the data.

The NRM system is audited for access from the operating system to the application level to ensure only approved users have access.

Access to the system and data are determined by business need and individual roles. Access to the applications containing PII is recertified and audited on a quarterly basis.

FS personnel who have access to NRM applications are authenticated (proof that the person is who they say they are) using the USDA eAuthentication system (Level 2) prior to access to the application. There is a secondary authentication of the user when they log into their FS corporate computer.

Data is encrypted in transit to the other systems cited below using either Secure Socket Layer (SSL) or secure File Transfer Protocol (sFTP).

Paper forms when not shredded are stored by a locked file cabinet or safe when appropriate.



## Section 3.0 Retention

The following questions are intended to outline how long information will be retained after the initial collection.

### 3.1 Time Period

How long is information retained?

The individual business Areas of NRM have data that is governed by specific agreements with NARA and Records Management. The businesses provide this information to the Records management group in line with their responsibilities. NRM retains or deletes information as required by the business rules determined by the Authorizing Official (AO). NRM retains the data indefinitely as neither the business nor AO have determined a business need for deletion of data.

#### 1580 – Grants, Cooperative Agreements, and Other Agreements

- Approved Grants and Agreements Case Files
  - Temporary, 10 years (see note); GRS 1.2, item 020 (DAA-GRS-2013-0008-0001)
- Grants and Agreements Case Files – Unapproved
  - Temporary, 3 years (see notes); GRS 1.2, item 021 (DAA-GRS-2013-0008-6)
- Grants and Agreements Significant Cases
  - PERMANENT N1-95-10-2, Item 34

#### 2820 – Mineral Leases, Permits, and Licenses

- Mineral Leases, Permits, and Licenses
  - Temporary, 50 years FY (see notes), DAA-0095-2018-0062-0001

#### 2210 – Rangeland Management Planning

- Range Allotment Management Plans
  - PERMANENT (see note); N1-95-10-6, item 26

- Grazing and Livestock Use Fee Studies
  - Temporary, 75 years (see note); N1-95-10-4, item 153
- Grazing and Livestock Use Fees
  - Temporary, 75 years (FY); N1-95-10-6, Item 27
- Grazing and Livestock Permittee Records
  - Temporary, 75 years (FY), (see notes) DAA-0095-2018-0030-0001

#### 2720 - Special Uses Administration

- Special Use Applications
  - Temporary, 10 years (see note); N1-95-10-4, item 247
- Special Use Easement Cases
  - Temporary, 10 years (see note); N1-95-10-4, item 250
- Special Use Permit Cases
  - Temporary 10 years FY (see notes); DAA-0095-2018-0059-0001
- Significant Special Uses Cases
  - PERMANENT (see note); N1-95-10-2, item 122

#### 2790 – Special Uses Data System

- Special Uses Reports
  - PERMANENT (see note); N1-95-10-2, Item 129

#### 2430 – Timber Sale Contract Administration

- Timber Sale Contracts
  - Temporary 30 years (see note); N1-95-10-4, item 202
- Timber Sale Permits
  - Temporary, 30 years (see note); N1-95-10-4, item 203

### **3.2 Approval**

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

Yes, Forest Service Program areas have worked with NARA to agree on retention times to comply with The Federal Records Act which says that agencies must be maintaining adequate and proper documentation of policies and transactions of the Federal Government. The business area records schedules indicate how long a document must be kept before it is transferred to a Federal Records Center, destroyed or transferred to NARA for permanent preservation. Businesses extract, archive or delete information from NRM as necessary to comply with their record retention requirements. NARA is still trying to ascertain how to archive certain types of data.

### **3.3 Risk Mitigation**

Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

Data set stored on NRM systems are subject to risk confidentiality and integrity. NRM mitigate the risk with role based access control and file integrity monitoring of the data set.



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## 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 Identification and Purpose

With which organization(s) outside of the Forest Service, but still within the Department of Agriculture is the information shared? What information is shared and for what purpose?

Grants & Agreements - USDA-Departmental Administration Information Technology Office (DAITO) Name Address Phone/Fax Email. Vendor ID (may be one of the following: Employer Identification Number (EIN), Social Security Number (SSN), Taxpayer Identification Number (TIN), Agency location Code (ALC). Payments and Collection data are provided to the FMFI system in order to make payments and to collect money that is due the Forest Service.

Range - shares with USDA-DAITO, Name Address, and Billing information is sent in order to bill the customer or to provide refunds if appropriate. This information is sent/returned to FMFI.

TIM - shares with USDA-DAITO, Name Address, Employer Identification Number (EIN), Social Security Number (SSN), Taxpayer Identification Number (TIN). The financial information is sent to the Financial Management Modernization Initiative (FMFI).

SUDS: shares with USDA-DAITO, Name Address, and Billing information is sent in order to bill the customer or to provide refunds if appropriate. This information is sent/returned to FMFI.

Minerals Materials: shares with USDA-DAITO, Name Address, and Billing information is sent in order to bill the customer or to provide refunds if appropriate. This information is sent/returned to FMFI.

### 4.2 Delivery and Disclosure

How is the information transmitted or disclosed?

All transactions are only provided electronically and transmitted via a Secure File Transfer site (sftp2).

### **4.3 Risk Mitigation**

Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Unauthorized access is gained during the sharing of data with internal organizations. The data is sent via a secure ftp site.

Upgrades to the Oracle software or the NRM software inadvertently provides access to PII data in the database whether it is locked or not Access is tested in PII after each release to ensure that the access via the oracle roles is still working correctly and that data that should be locked is still locked. Data encryption is tested after each release to make sure that it is still working at the database level and on the associated forms.

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## 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 Identification and Purpose

With which external organization(s), outside of both the Forest Service and the Department of Agriculture, is the information shared? What information is shared, and for what purpose?

Grants & Agreements - Office of Inspector General (OIG), OMB, and USAspending: No PII is shared with any of these external organizations. The data that is provided is used for audits and reporting accomplishments.

Mineral Materials - US Geological Survey (USGS), OIG, and OMB: No PII is shared with any of these external organizations. The data that is provided is used for audits, reporting accomplishments, or information requests.

Range, Special Uses (SUDS), and Tim: N/A

### 5.2 Compatibility

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, provide SORN name and hyperlink URL to text.

**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

### 5.3 Delivery and Security Measures

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

N/A



## **5.4 Risk Mitigation**

Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

N/A

## Section 6.0 System of Records Notice (SORN)

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 Requirement and Identification

Does this system require a SORN?

**If so**, please provide SORN name and hyperlink URL to text.

**If a SORN is not required**, answer “No” to this question, and “N/A” for questions 6.2 through 6.5.

Minerals Materials: [FS-16](#)

Range: [FS-14](#), [FS-16](#)

Special Uses Data System: [FS-24](#), [FS-16](#)

Grants and Agreements: [OCFO-10](#)

Timber Information Manager: [OCFO-10](#)

### 6.2 Individual Notification

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

Information to individuals is provided via:

NRM Privacy Impact Analysis (PIA) on the USDA PIA website.

The Federal register for SORN’s and legal authorities

FS specific SORNs are also published on FS websites

Forms are approved through OMB for the Paperwork Reduction Act (also cited in the Federal Register) and they cite the privacy information act.



### **6.3 Right to Decline**

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

Yes, however if they do decline, they will not receive the product/services requested.

### **6.4 Right of Consent**

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

Yes, individuals have the right to consent to particular uses of information. NRM itemizes consent using the minimal necessary PII required to complete transactions requested by individuals. Individuals can either accept the uses required to complete their particular transaction or not accept the particular uses. If consent is not given, then transactions do not have sufficient information to occur.

### **6.5 Risk Mitigation**

Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.

Grants and Agreements - All personal information is requested on a voluntary basis; however, if this information is not provided a grant or agreement will not be awarded. Solicitation of this information is necessary to comply with the Federal Financial Assistance Management Improvement Act of 1999, P.L. 106-107. The personal information requested is provided on a paper form that is kept in a locked drawer after being signed. When sending bills via USPS to the customer, the only PII included is the customer's name and address. This is shown either on the envelope or in the envelope's window.

Mineral Materials - All personal information is requested on a voluntary basis; however, if you do not provide this personal information, your application will not be accepted, and the permit will not be granted to you. Solicitation of this information is necessary for the government to conduct its permit program and thus is authorized under the National Forest Management Act of 1976, (16 USC 472a). The personal information requested is provided on a paper form that is kept in a locked drawer after being signed. When sending bills via USPS to the customer, the only PII included is the customer's name and address. This is shown either on the envelope or in the envelope's window.

Range - All personal information is requested on a voluntary basis; however, if you do not provide this personal information, your application will not be accepted, and the permit will not be granted to you. Solicitation of this information is necessary for the government to conduct its permit program and thus is authorized under the National Forest Management Act of 1976, (16 USC 472a). The personal information requested is provided on a paper form that is kept in a locked drawer after being signed. When sending bills via USPS to the customer, the only PII included is the customer's name and address. This is shown either on the envelope or in the envelope's window.

Special Uses Data System - All personal information is requested on a voluntary basis; however, if you do not provide this personal information, your application will not be accepted, and the authorization will not be granted to you. Solicitation of this information is necessary for the government to conduct its authorization program. See section 1.6 for the laws & regulations that allow this. The personal information requested is provided on a paper form that is kept in a locked drawer after being signed. When sending bills via USPS to the customer, the only PII included is the customer's name and address. This is shown either on the envelope or in the envelope's window.

Special Forest Products (Timber Information Manager) - All personal information is requested on a voluntary basis; however, if you do not provide this personal information, your bid will not be accepted, and the contract will not be awarded to you. Solicitation of this information is necessary for the government to conduct its sale program and thus is authorized under the National Forest Management Act of 1976, (16 USC 472a). The personal information requested is provided on a paper form that is kept in a locked drawer after being signed. When sending bills via U.S. Postal Service (USPS) to the customer, the only PII included is the customer's name and address. This is shown either on the envelope or in the envelope's window.

## 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 Access

What are the procedures that allow individuals to gain access to their information?

Grants & Agreements - Partners and recipients are required to provide accurate information when applying for a grant or in working with the FS on an agreement. This information is validated against the System for Award Management (SAM) prior to award. Therefore, they know what information was provided.

Mineral Materials - The customer can phone, visit or email the Forest Service local unit where the original transaction occurred.

Range - The customer can visit the Forest Service office where the original transaction occurred, they can see their information.

Special Uses (SUDS) - The customer can phone, visit or email the Forest Service local unit where the original transaction occurred

TIM - The customer can visit the Forest Service office where the original transaction occurred, they can see their information.

### 7.2 Correction

What are the procedures for correcting inaccurate or erroneous information?

Grants & Agreements - If there is a change needed to our partners contacts in anyway, address, email or individual they are required by 2 CFR 200 to notify the FS and a formal modification to the award is done to document the change. Before making an award or modification the partner contacts, address DUNS and EIN are validated against SAM for accuracy by G&A and Financial Management Modernization Initiative (FMMI).

Mineral Materials - The customer is required to submit all change requests in writing. They can deliver in person or scan and email the request to the Forest Service local unit where the original transaction occurred.

Range - The customer can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information. They can also change it during their annual authorization meeting. The only change that

cannot be made to an existing document is name changes. Name changes require a new application and permit. Other changes are communicated to the Albuquerque Service Center (ASC) to submit the change to Financial Management Modernization Initiative (FMMI) via the standard established email process.

Special Uses (SUDS) - The customer can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information. Annual billings direct them to "send" any change of address to their Ranger District or Forest Headquarters Office.

TIM - Permits: The customer can visit the Forest Service office where the original transaction occurred to fix erroneous information. Typically, it is changed when a new permit is purchased as permits are short term. Timber Contracts: The customer can request changes in person or in writing (email or letter with signature) to the FS district they do business with

### **7.3 Notification**

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

Grants & Agreements - Procedures for correcting their information are provided in the award packet.

Mineral Materials - Notification occurs at time of information collection. They are notified that they can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information.

Range - Notification occurs at time of information collection. They are notified that they can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information.

Special Uses (SUDS) - Notification occurs at time of information collection. They are notified that they can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information.

TIM - Notification occurs at time of information collection. They are notified that they can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information.

### **7.4 Redress Alternatives**

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



Grants & Agreements - The customer can phone, visit or email the Forest Service local unit where the original transaction occurred.

Mineral Materials - The customer can phone, visit or email the Forest Service local unit where the original transaction occurred.

Range - The customer can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information.

Special Uses (SUDS) - The customer can phone, visit or email the Forest Service local unit where the original transaction occurred.

TIM - The customer can phone, visit, or email the Forest Service office where the original transaction occurred to fix erroneous information.

## **7.5 Risk Mitigation**

Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

A customer contacting a FS office claiming to be customer could request a change to PII without being required to prove that they are who they say they are. Unfamiliar customers who contact a FS office are required to physically come to the office where the permit or contract was let and provide picture identification in order to make any changes to PII.

Contract customers are generally well known to district personnel. Customer information is on file at districts and checked before any changes are made to the customer's information. Additional identification can be requested, or they can be asked to present information updates in person.

## Section 8.0 Technical Access and Security

The following questions are intended to describe technical safeguards and security measures.

### 8.1 Procedures

What procedures are in place to determine which users may access the system and are they documented?

All applications have Oracle roles defined in the database. These roles define what level of access a user is assigned to an application. The User Management Application (UMA) application is used to assign these roles and also to what subsets of the data (referred to as organizational units) a user may have access to.

UMA has an automated process to request and approve access to applications on the NRM General Support System (GSS). A user requests specific roles and org codes which allow access to specific subsets of data. The request is automatically forwarded to the requester's UMA Manager who approves or denies the request. The UMA manager is responsible for determining what level of access a given user requires to fulfill his/her job responsibilities.

UMA is used by all 5 NRM applications to determine and record access to their systems.

### 8.2 Contractor Access

Will Department contractors have access to the system?

Grants & Agreements - Yes, read only

Mineral Materials – Yes

Range - No

Special Uses (SUDS) – Yes

TIM – No

### **8.3 Privacy Training**

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

Users are required to take the Annual Security Awareness Training Course and Rules of Behavior currently provided by the USDA via AgLearn computer-based training (CBT).

### **8.4 System Authority to Operate**

Has Assessment & Authorization been completed for the system(s) supporting the program? If so, answer “Yes” and provide ATO expiration date(s).

Yes, NRM received their latest Authority To Operate (ATO) on February 2, 2020.

### **8.5 Audit and Technical Safeguards**

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

Unauthorized individuals gaining access to the data via the system. The NRM system is audited for access from the operating system to the application level to ensure only approved users have access.

Unauthorized individuals gaining access to the data via the application. Access to the system and data are determined by business need and individual roles. Access to the applications containing PII is recertified and audited on a quarterly basis.

### **8.6 Risk Mitigation**

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?

Unauthorized individuals gaining access to the data. FS personnel who want access to NRM applications are authenticated (proof that the person is who they say they are) using the USDA eAuthentication system (Level 2) prior to access to the application. There is a secondary authentication of the user when they log into their FS corporate computer.



FS personnel must also be given access to the system and data based on business need and the individual roles. Unauthorized access is gained during the sharing of data with internal organizations. Data is encrypted in transit to the other systems cited below using either Secure Socket Layer (SSL) or secure File Transfer Protocol (sFTP).



## **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 Description**

What type of project is the program or system?

The Natural Resource Manager (NRM) is a system inclusive of a suite of applications that are used for managing corporate agency data across the Forest Service.

### **9.2 Privacy Concerns**

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

No for all applications.

## 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 Review

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. The System Owner has reviewed the above OMB memorandums

### 10.2 Purpose

What is the specific purpose of the agency’s use of 3rd party websites and/or applications?

N/A - NRM does not use any 3rd party websites and/or applications.

### 10.3 PII Availability

What Personally Identifiable Information (PII) will become available through the agency’s use of 3rd party websites and/or applications.

N/A - NRM does not use any 3rd party websites and/or applications.

### 10.4 PII Usage

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

N/A - NRM does not use any 3rd party websites and/or applications.

### 10.5 PII Maintenance and Security

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 - NRM does not use any 3rd party websites and/or applications.

### 10.6 PII Purging

Is the PII that becomes available through the agency's use of 3rd party websites and/or applications purged periodically? If so, is it done automatically? If so, is it done on a recurring basis?

N/A - NRM does not use any 3rd party websites and/or applications.

### 10.7 PII Access

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

N/A - NRM does not use any 3rd party websites and/or applications.

### 10.8 PII Sharing

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 - NRM does not use any 3rd party websites and/or applications.

### 10.9 SORN Requirement

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 - NRM does not use any 3rd party websites and/or applications.

### 10.10 Web Measurement and Customization

Does the system use web measurement and customization technology? If so, is the system and procedures reviewed annually to demonstrate compliance to OMB M-10-23?

N/A - NRM does not use any 3rd party websites and/or applications.

### 10.11 Web Measurement and Customization Opt-In/Opt-Out



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? If so, does the agency provide the public with alternatives for acquiring comparable information and services?

N/A - NRM does not use any 3rd party websites and/or applications.

## **10.12 Risk Mitigation**

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.

N/A - NRM does not use any 3rd party websites and/or applications.



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**Responsible Official**

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Heather Busam  
System Owner (SO)  
Natural Resources and Environment, Forest Service  
United States Department of Agriculture

**Approval Signature**

**JAMIE  
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Cynthia Ebersohn  
Privacy Officer (PO)  
Natural Resources and Environment, Forest Service  
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