



# **U.S. DEPARTMENT OF AGRICULTURE**

## **PRIVACY IMPACT ASSESSMENT**

VERSION 1.4

**OFFICE OF THE CHIEF PRIVACY OFFICER**

The completion of USDA Privacy Impact Assessments (PIAs) is mandated for any rulemaking, program, system, or practice that collects or uses PII under the authority of the E-government Act of 2002 (44 U.S.C. § 208(b)) and USDA DR 3515-002, Privacy Policy and Compliance for Personally Identifiable Information (PII).

*The PIA is designed to identify risk associated with the use of PII by a system, program, project or practice, and to ensure that vital data stewardship issues are addressed for all phases of the System Development Life Cycle (SDLC) of IT systems. It also ensures that security and privacy protections are built into an IT system during its development cycle. By regularly assessing privacy concerns during the development process, USDA ensures that proponents of a program or technology have taken its potential privacy impact into account from the beginning. The PIA also serves to help identify what level of security risk is associated with a program or technology. In turn, this allows the Department to properly manage the security requirements under the Federal Information Security Management Act (FISMA).*

USDA DR 3515-002, Privacy Policy and Compliance for Personally Identifiable Information (PII).

Please note that the E-government Act of 2002 requires that a PIA be made available to the public. In order to comply with this requirement, PIAs will be published online for the general public to view. When completing this document please use simple, straight-forward language, avoid overly technical terminology, and write out acronyms the first time you use them to ensure that the document can be read and understood by the general public.

**Guidance on how to complete the following PIA Questionnaire is available [here](#).**



# Privacy Impact Assessment

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Privacy Impact Assessment for the USDA IT System/Project:

## **Natural Resources and Environment FS Voice over IP** **(NRE FS VoIP)**

Forest Service

Chief Information Office

Date PIA submitted for review:

15 February 2024

Mission Area System/Program Contacts:

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## Abstract

Voice over Internet Protocol (VoIP), also called IP telephony, is a method and group of technologies for the delivery of voice communications and multimedia sessions over Internet Protocol (IP) networks, such as the Internet. The terms Internet telephony, broadband telephony, and broadband phone service specifically refer to the provisioning of communications services (voice, fax, SMS, voice-messaging) over the public Internet, rather than via the public switched telephone network (PSTN), also known as plain old telephone service (POTS). The NRE FS VoIP is the Voice over IP system for enterprise level voice services and messaging for USDA Forest Service. Call center managers are located in Springfield Oregon and Albuquerque New Mexico for redundancy.

## Overview

The Forest Service (FS) of the United States Department of Agriculture (USDA) is a multi-faceted agency that manages and protects 154 national forests and 20 grasslands in 44 states and Puerto Rico. The agency's mission is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations.

The NRE FS VoIP is the Voice over IP system for enterprise level voice services and messaging for USDA Forest Service. Call center managers are located in Springfield Oregon and Albuquerque New Mexico for redundancy. Forest Service users communicate over the Client Experience Center (CEC) Network Boundary to transmit and access personalized and messaging data from Forest Service VoIP call and unity managers providing voice and messaging services.

Principal system components:

Cisco and Mitel servers in Springfield, OR, and Albuquerque, NM

Mitel servers are remote sites

Cisco, Mitel, Polycom, and V-Tech end devices at remote sites

This PIA is being created for NRE FS VoIP. This privacy impact assessment identifies how information about individuals is handled within NRE FS VoIP in accordance with OMB M-03-22.

## Section 1.0 Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what SORN applies, if an ATO has been completed and if there is Paperwork Reduction Act coverage.

### 1.1. What legal authorities and/or agreements permit the collection of information by the project or system?

The legal authority to operate the system comes from Forest and Rangeland Renewable Resources Planning Act of 1974, (Public Law 93-378); National Forest Management Act of 1976 (Public Law 94-588); For additional Federal requirements for the collection of information, also see: 5 U.S.C. Chapter 552, 44 U.S.C. Chapters 21, 29, 31, and 33 (Records Management), and 18 U.S.C. 2071, 44 U.S.C. 3101 et seq., 44 U.S.C. 3506, 36 CFR Chapter 12, Subchapter B, 36 CFR Part 1234

## 1.2 Has Authorization and Accreditation (A&A) been completed for the system? Yes

1. Approved 4/26/2024

3. Operational, 4. 4/25/23

5. 4/25/26

6. 4/1/25

7. Low

**1.3. What System of Records Notice(s) (SORN(s)) apply to the information?** There is no applicable SORN.

**1.4. Is the collection of information covered by the Paperwork Reduction Act?** No

## Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.

### 2.1. What information is collected, used, disseminated, or maintained in the system/program?

PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional sensitive PII is collected, used, disseminated, created, or maintained, please list those in the text box below:

Identifying Numbers			
<input type="checkbox"/>	Social Security number	<input type="checkbox"/>	Truncated or Partial Social Security number
<input type="checkbox"/>	Driver's License Number	<input type="checkbox"/>	License Plate Number
<input type="checkbox"/>	Registration Number	<input type="checkbox"/>	File/Case ID Number
<input type="checkbox"/>	Student ID Number	<input type="checkbox"/>	Federal Student Aid Number
<input type="checkbox"/>	Passport number	<input type="checkbox"/>	Alien Registration Number

<input type="checkbox"/>	DOD ID Number	<input type="checkbox"/>	DOD Benefits Number
<input type="checkbox"/>	Employee Identification Number	<input type="checkbox"/>	Professional License Number
<input type="checkbox"/>	Taxpayer Identification Number	<input type="checkbox"/>	Business Taxpayer Identification Number (sole proprietor)
<input type="checkbox"/>	Credit/Debit Card Number	<input type="checkbox"/>	Business Credit Card Number (sole proprietor)
<input type="checkbox"/>	Vehicle Identification Number	<input type="checkbox"/>	Business Vehicle Identification Number (sole proprietor)
<input type="checkbox"/>	Personal Bank Account Number	<input type="checkbox"/>	Business Bank Account Number (sole proprietor)
<input type="checkbox"/>	Personal Device Identifiers or Serial Numbers	<input type="checkbox"/>	Business device identifiers or serial numbers (sole proprietor)
<input type="checkbox"/>	Personal Mobile Number	<input checked="" type="checkbox"/>	Caller ID phone number
<input type="checkbox"/>	Health Plan Beneficiary Number		
<b>Biographical Information</b>			
<input checked="" type="checkbox"/>	Name via Caller ID	<input type="checkbox"/>	Gender
<input type="checkbox"/>	Date of Birth (MM/DD/YY)	<input type="checkbox"/>	Ethnicity
<input type="checkbox"/>	Country of Birth	<input type="checkbox"/>	City or County of Birth
<input type="checkbox"/>	Citizenship	<input type="checkbox"/>	Immigration Status
<input type="checkbox"/>	Home Address	<input type="checkbox"/>	Zip Code
<input type="checkbox"/>	Spouse Information	<input type="checkbox"/>	Sexual Orientation
<input type="checkbox"/>	Marital Status	<input type="checkbox"/>	Military Service Information
<input type="checkbox"/>	Race	<input type="checkbox"/>	Nationality
<input type="checkbox"/>	Personal e-mail address	<input type="checkbox"/>	Business e-mail address
<input type="checkbox"/>	Employment Information	<input type="checkbox"/>	Alias (username/screenname)
<input type="checkbox"/>	Education Information	<input type="checkbox"/>	Resume or curriculum vitae
<input type="checkbox"/>		<input type="checkbox"/>	Business Mailing Address (sole proprietor)
<input type="checkbox"/>		<input type="checkbox"/>	Business Phone or Fax Number (sole proprietor)
<input type="checkbox"/>		<input type="checkbox"/>	Group/Organization Membership
<input type="checkbox"/>		<input type="checkbox"/>	Religion/Religious Preference
<input type="checkbox"/>		<input type="checkbox"/>	Home Phone or Fax Number
<input type="checkbox"/>		<input type="checkbox"/>	Children Information
<input type="checkbox"/>		<input type="checkbox"/>	Mother's Maiden Name
<input type="checkbox"/>		<input type="checkbox"/>	Global Positioning System (GPS)/Location Data
<input type="checkbox"/>		<input type="checkbox"/>	Personal Financial Information (including loan information)
<input type="checkbox"/>		<input type="checkbox"/>	Business Financial Information (including loan information)
<input type="checkbox"/>		<input type="checkbox"/>	Professional/personal references
<b>Biometrics/Distinguishing Features/Characteristics</b>			
<input type="checkbox"/>	Fingerprints	<input type="checkbox"/>	Palm prints
<input type="checkbox"/>	Retina/Iris Scans	<input type="checkbox"/>	Dental Profile
<input type="checkbox"/>	Hair Color	<input type="checkbox"/>	Eye Color
<input type="checkbox"/>	Video recording	<input type="checkbox"/>	Photos
<input type="checkbox"/>	DNA Sample or Profile	<input type="checkbox"/>	Signatures
<input type="checkbox"/>		<input type="checkbox"/>	Vascular scans
<input type="checkbox"/>		<input type="checkbox"/>	Scars, marks, tattoos
<input type="checkbox"/>		<input type="checkbox"/>	Height
<input type="checkbox"/>		<input type="checkbox"/>	Voice/ Audio Recording
<input type="checkbox"/>		<input type="checkbox"/>	Weight
<b>Medical/Emergency Information</b>			
<input type="checkbox"/>	Medical/Health Information	<input type="checkbox"/>	Mental Health Information
<input type="checkbox"/>	Workers' Compensation Information	<input type="checkbox"/>	Patient ID Number
<input type="checkbox"/>		<input type="checkbox"/>	Disability Information
<input type="checkbox"/>		<input type="checkbox"/>	Emergency Contact Information

Device Information					
<input type="checkbox"/>	Device settings or preferences (e.g., security level, sharing options, ringtones)	<input type="checkbox"/>	Cell tower records (e.g., logs, user location, time, etc.)	<input type="checkbox"/>	Network communications data
Specific Information/File Types					
<input type="checkbox"/>	Personnel Files	<input type="checkbox"/>	Law Enforcement Information	<input type="checkbox"/>	Credit History Information
<input type="checkbox"/>	Health Information	<input type="checkbox"/>	Academic/Professional Background Information	<input type="checkbox"/>	Civil/Criminal History Information/Police Record
<input type="checkbox"/>	Case files	<input type="checkbox"/>	Security Clearance/Background Check	<input type="checkbox"/>	Taxpayer Information/Tax Return Information

## 2.2. What are the sources of information in the system/program?

Caller ID and Voicemail are only sources of the information that is collected by the system.

### 2.2.1. How is the information collected?

When a caller calls an NRE FS VoIP number, the caller's number and name is displayed during call, if the caller and the NRE FS site's voice infrastructure supports it. Number and name can be retrieved through an NRE FS VoIP phone setting on the phone. A caller may additionally leave a voicemail that could potentially contain PII. The recommended standard greeting for voicemail is as follows:

"You have reached the voicemail of <name>. Please leave a brief message, and I will return your call as soon as possible. As a reminder, do not leave any personal identifiable information, such as your social security number, date of birth, or medical information in your message. Additionally, do not leave any controlled unclassified information, which is information restricted as "need to know." I will gather such information when I return your call."

## 2.3. Does the project/program or system use information from commercial sources or publicly available data. If so, explain why this is used?

No



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### 2.4. How will the information be checked for accuracy? How often will it be checked?

Not Applicable.

### 2.5. Does the system/program use third-party websites?

Not applicable

#### 2.5.1. What is the purpose of the use of third-party websites?

N/A

#### 2.5.1.1. What PII will be made available to the agency through the use of third-party websites?

Not Applicable.

### 2.6. PRIVACY IMPACT ANALYSIS: Related to Characterization of Information.

Follow the format below:

**Privacy Risk:** NRE FS VoIP does collect the name and number of the caller calling in, and a voicemail can be left that may contain PII.

**Mitigation:** VoIP phones are in controlled facilities. Callers are instructed via their voice mail greeting to leave the following message:

“You have reached the voicemail of <name>. Please leave a brief message, and I will return your call as soon as possible. As a reminder, do not leave any personal identifiable information, such as your social security number, date of birth, or medical information in your message. Additionally, do not leave any controlled unclassified information, which is information restricted as “need to know.” I will gather such information when I return your call.”

## Section 3.0 Uses of the Information

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.





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### 3.1. Describe why and how the information collected, used, disseminated and/or maintained will support the program's business purpose?

Allow content subscribers to see who called them last and return their call and/or retrieve voicemail to return calls for official work.

### 3.2. Does the system/project/program use technology to conduct electronic searches, queries, or analysis in an electronic database to discover or locate a predictive pattern or anomaly? If so, state how USDA plans to use such results.

No

### 3.3. PRIVACY IMPACT ANALYSIS: Related to uses of the information.

Follow the format below:

**Privacy Risk:** The risk is that users' name and number is left on the phone and could be reviewed by an unauthorized user.

**Mitigation:** VoIP phones are in controlled facilities. The voicemail Callers are instructed via their voice mail greeting to leave the following message:

"You have reached the voicemail of <name>. Please leave a brief message, and I will return your call as soon as possible. As a reminder, do not leave any personal identifiable information, such as your social security number, date of birth, or medical information in your message. Additionally, do not leave any controlled unclassified information, which is information restricted as "need to know." I will gather such information when I return your call."

## Section 4.0 Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to use of the information, and the right to decline to provide information.

### 4.1. How does the project/program/system provide notice to individuals prior to collection?

Users give implicit consent.

### 4.2. What options are available for individuals to consent, decline, or opt out of the project?



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None

## 4.3. PRIVACY IMPACT ANALYSIS: Related to Notice

Follow the format below:

**Privacy Risk:** The risk is that the caller could ignore the voicemail warning and leave PII in a voicemail.

**Mitigation:** There is a voicemail warning not to leave PII.

“You have reached the voicemail of <name>. Please leave a brief message, and I will return your call as soon as possible. As a reminder, do not leave any personal identifiable information, such as your social security number, date of birth, or medical information in your message. Additionally, do not leave any controlled unclassified information, which is information restricted as “need to know.” I will gather such information when I return your call.”

## Section 5.0 Data Retention

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

### 5.1. What information is retained and for how long?

Name and phone number are retained up to 150 callers. Any caller after 150 overwrites the first of the previous callers. Voicemail can be deleted as necessary by content subscriber.

### 5.2. Has the retention schedule been approved by the USDA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.

File 6230 Intermediary Records 1 year

### 5.3. PRIVACY IMPACT ANALYSIS: Related to retention of information.

Follow the format below:

**Privacy Risk:** The risk is that 150 names and numbers could be searched through.

**Mitigation:** It is mitigated by security measures that limit who can be in a building unattended, and all employees, contractors, and so forth are constrained from willful disclosure of the information by the Privacy Act and by signing the Rules of Behavior (ROB) every year.



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## Section 6.0 Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

**6.1. With which internal organizations and/or systems is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?**

No information is shared in NRE FS VoIP.

**6.2. PRIVACY IMPACT ANALYSIS: Related to internal sharing and disclosure.**

Follow the format below:

**Privacy Risk:** The risk is that you can save a record of the name and numbers.

**Mitigation:** It is mitigated by security measures that limit who can be in a building unattended, and all employees, contractors, and so forth are constrained from willful disclosure of the information by the Privacy Act and by signing the ROB) every year.

**6.3. With which external organizations (outside USDA) is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?**

No information is shared outside of USDA

**6.4. PRIVACY IMPACT ANALYSIS: Related to external sharing and disclosure.**

Follow the format below:

**Privacy Risk:** None

**Mitigation:** None

## Section 7.0 Redress

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about him or her.



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

NA

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

None

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

None

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

None

**7.5. PRIVACY IMPACT ANALYSIS: Related to Redress.**

Follow the format below:

**Privacy Risk:** None

**Mitigation:** There are no ways to search for information on any individual in the NRE FS VoIP system.

## Section 8 Auditing and Accountability

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

**8.1. How is the information in the system/project/program secured?**

Voicemail requires a six-digit pin to access.

**8.2. What procedures are in place to determine which users may access the program or system/project, and are they documented?**



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Each content subscriber has their own unique six-digit pin, which is required to change every 90 days.

### **8.3. How does the program review and approve information sharing requirements?**

There are no sharing requirements in NRE FS VoIP.

### **8.4. Describe what privacy training is provided to users either generally or specifically relevant to the program or system/project?**

All FS employees must take Information Security Awareness Training (ISAT) ROB training.

### Approval Signatures:

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Operation and Service Delivery-SO  
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