

Privacy Impact Assessment

Foreign Agricultural Service

Customer Relationship Management Cloud

■ Version: 2.0

Trade and Foreign Agricultural Affairs/Foreign Agricultural Service





Privacy Impact Assessment for the
Foreign Agricultural Service
Customer Relationship Management Cloud
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Abstract

This Privacy Impact Assessment (PIA) was prepared to document the FAS Customer Relationship Cloud (FCRM Cloud) information system and how that information system supports the mission of the Foreign Agricultural Service. FCRM Cloud is in the USDA Salesforce cloud and its capabilities are available to USDA employees or the public. This PIA was conducted because USDA employees collect, use, and maintain information in the system to support the following government activities:

1. Dairy Import Program
2. Agency Senior Executive meeting schedules and briefing materials
3. International Fellowship and Exchange Programs
4. Sugar Import Program

Overview

FCRM Cloud is a modern flexible information system serving the mission of the USDA Trade and Foreign Agricultural Affairs (TFAA) Foreign Agricultural Service (FAS). FCRM Cloud is a single tenant information system that provides modern software for replacing legacy systems or for reducing current day manual activities. This software is a Federal Risk and Authorization Management Program (FedRAMP) certified USDA cloud service. It provides a modern high-performance system to make government work more efficient and improve the relationship with our customer.

The four capabilities in FCRM Cloud use the following four general categories of data:

1. Fellows, Mentors, Principal Investigators, and Implementers involved ensuring the success of training and collaborative research opportunities
2. Company owners and employees importing products to the US through the Dairy Import Program
3. Company owners and employees importing and exporting products through the Sugar Import Program
4. Guests, participants, and meeting materials for meetings with Senior Leadership of TFAA, TFAA/FAS, and USDA.

There are two types of transactions typically conducted in the information system:

1. USDA employees view, edit, and create records in the system to operate the government program and deliver services to the customer. This may include opening, closing, and archiving Fellowship programs, updating meeting event details or location, viewing or correcting records for companies that import, viewing or correcting quantities of material imported. USDA employees conduct these activities using hardware and networks provided by USDA.
2. Participants in the Dairy Import Program or Sugar Import Program can login to view and edit their profile, or view (only) their company's contact information, license

information, quantity of imported amounts, and monitor their individual participation in the Program.

The FCRM Cloud information system does not share information. External public participants can use their digital office tools to copy the data they view. The participants in the Dairy Import Program and Sugar Import Program are the only external public participants with access to the system, and they are limited to accessing their information. USDA employees can access and view all data in the system and do regularly to ensure the success of the government activities. USDA employees can print, copy the data they view, or summarize data for separate discussions.

These legal authorities apply to specific government activities in the FCRM Cloud information system:

- CFR TITLE 7—AGRICULTURE PART 6 -- Subpart--Dairy Tariff-Rate Import Quota Licensing Import licensing is one of the tools the U.S. Department of Agriculture (USDA) uses to administer the tariff-rate quota (TRQ) system for U.S. imports of dairy products.
- 15 CFR Part 2011 - Sugar to be Imported and Re-Exported in Refined Form or in Sugar Containing Products, or Used for the Production of Polyhydric Alcohol
- 7 CFR Part 1530 - The Refined Sugar Re-Export Program, the Sugar Containing Products Re-Export Program, and the Polyhydric Alcohol Program

Section 1.0 Characterization of the Information

This section will define the scope of the information requested and presented as well as reasons for its collection as part of the FCRM Cloud information system.

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

Fellowship and Exchange Programs	
Fellow Fullname	Mentor/Trainer Fullname
Fellow Address	Mentor/Trainer Address
Fellow Phone	Mentor/Trainer Gender
Fellow Gender	Mentor/Trainer Phone
Fellow Date of Birth	Principal Investigator Fullname
Implementor Fullname	Principal Investigator Phone
Implementor Congressional District	Principal Investigator Email
Implementor Address	Subject Matter Expert Contact name
Implementor Phone	Subject Matter Expert Email
Agency Senior Executive meeting schedules and briefing materials	
Principal Fullname	USDA Employee Fullname
Meeting Address	Organization POC Contact Name
	Organization POC Phone Number

Dairy Import Program	
USDA Employee Fullname	Tax Identification Number
Current Owner Phone	General Contact Fullname
Current Owner Email	General Contact Phone
Company Address	General Contact Email
Sugar Import Program	
Company Contact Fullname	Tax Identification Number
Contact Phone	Contact Email

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

The sources of the information are the participants in TFAA/FAS Fellowship and Exchange Programs. The information is collected outside of the FCRM Cloud information system by USDA employees and then entered into the information system by USDA employees.

The sources of the information are the USDA employees authoring meeting schedules and briefing materials. The USDA employee prepares briefings, agricultural reports, statistics, and graphics for the meeting outside of the FCRM Cloud. FCRM Cloud routes the materials to supervisors and the initial requestor for review and approved. Final documents are printed and transported to the meeting.

The sources of the information are external public participants in the Dairy Import Program or Sugar Import Program. The external public participants provide enough contact information to regularly communicate with USDA, register for import licenses, and certify the individual importing companies. The external public participant uses the FCRM Cloud information system to provide the company's tax identification number. For a sole proprietorship this is assumed to be the participant Social Security Number. All external public participants are asked to provide a phone number and email address.

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

Information is collected either inside or outside of the information system, used, or maintained in the FCRM Cloud information system to manage the Federal programs or events identified by USDA. The information allows USDA to deliver services to the public and enforce rules in the following government activities:

- Fellowship and Exchange Programs
- Agency Senior Executive meeting schedules and briefing materials
- Dairy Import Program
- Sugar Import Program

1.4 How is the information collected?

Information collected for the Fellowship and Exchange Programs is collected outside of the FRCM information system. The information is received at USDA as a scanned copy of the application provided by the University and collected by the Mentor or Principal as described in Section 1.1 of this PIA. The information is later entered in this system by a USDA employee.

Information for the meeting schedules and meeting materials is provided by the USDA employee requesting the meeting. Outside of the information system, the USDA employee will collect the names of the meeting principals and other meeting details. Inside the information system, supervisors and event managers will divide the meeting tasks among named USDA employees and return prepared documents for review and acceptance.

Information is collected from the participants of the Dairy Import Program and Sugar Import Program. Participants use the public facing webpage for the FCRM Cloud information system. Participants are presented webpages to collect registration, account, and company information as described in Section 1.1 of this PIA.

1.5 How will the information be checked for accuracy?

The government activities that predate this information system require that each new entry be reviewed and approved before the entity can participate in the government program or activity.

- The information submitted by potential Fellows, Implementors, Mentors, or Principal Investigators must be reviewed by USDA before being approved.
- The meeting requested will be reviewed by the Agency Chief of Staff and approved if it is an appropriate government activity.
- Companies and company representatives provide documentation outside of the information system to document their suitability to participate in the import program. The contact information provided in the information system is less but is checked to ensure there is a match.

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

- CFR TITLE 7—AGRICULTURE PART 6 -- Subpart--Dairy Tariff-Rate Import Quota Licensing Import licensing is one of the tools the U.S. Department of Agriculture (USDA) uses to administer the tariff-rate quota (TRQ) system for U.S. imports of dairy products.
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1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

Given the type of data collected, this information system is at risk of the misuse or loss of Personal Identifiable Information. The cloud software provider to the primary source of mitigating this risk. While FCRM Cloud had a Moderate FISMA categorization, the cloud software provider operates this software for FAS as a High FISMA categorized system. This provides encryption of data at rest, in transit, and data loss prevention measures detailed in the cloud software provides FedRAMP system security plan.

Section 2.0 Uses of the Information

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

2.1 Describe all the uses of information.

Fellowship and Exchange Programs

The Borlaug International Agricultural Science and Technology Fellowship Program promotes food security and economic growth by providing training and collaborative research opportunities to Fellows from developing and middle-income countries.

Borlaug Fellows are generally scientists, researchers, or policymakers who are in the early or middle stages of their careers. Each Fellow works one-on-one with a mentor at a U.S. university, research center, or government agency, usually for 8-12 weeks. The U.S. mentor will later visit the Fellow's home institution to continue collaboration. Fellows may also attend professional conferences and events within their field, such as the annual World Food Prize Symposium.

The Borlaug Fellowship Program honors Norman E. Borlaug, the American agronomist, humanitarian, and Nobel laureate known as the "Father of the Green Revolution." Since the program's inception in 2004, hundreds of Fellows from across the globe have participated in research and training focused on a wide array of agriculture-related topics, including: agronomy, veterinary science, nutrition, food safety, sanitary and phytosanitary issues, natural resource management, agricultural biotechnology, agricultural economics, and agricultural policy. By improving participants' understanding of agricultural science, the program helps foster science-based trade policies that improve international market access for U.S. agricultural products. (<https://www.fas.usda.gov/programs/borlaug-fellowship-program>)

The Cochran Fellowship Program, named after the late U.S. Senator William Thad Cochran, provides short-term training opportunities to agricultural professionals from middle-income countries, emerging markets, and emerging democracies.

The goals are:

- to help eligible countries develop agricultural systems necessary to meet the food and fiber needs of their domestic populations; and
- to strengthen and enhance trade linkages between eligible countries and agricultural interests in the United States.

The Cochran Fellowship Program provides 2-3 weeks of U.S. agriculture training. Fellows work with U.S. universities, government agencies, and private companies. They receive hands-on training to enhance their technical knowledge and skills in areas related to agricultural trade, agribusiness development, management, policy, and marketing.

(<https://www.fas.usda.gov/programs/cochran-fellowship-program>)

The Embassy Science Fellows Program places USDA technical experts at American embassies overseas to provide expertise, advice and assistance with issues relating to the environment, science, technology, and health. Since the program's inception in 2022, FAS has placed Fellows in countries around the world to work in areas of strategic importance to USDA, including trade capacity building, biotechnology, food safety, animal health, and sanitary/phytosanitary issues. (<https://www.fas.usda.gov/programs/embassy-science-fellows-program>)

The Faculty Exchange Program enhances the teaching ability of agricultural educators from institutions of higher learning in developing countries. Participants come to the United States for one academic semester (4 months) to acquire new knowledge and enhance their ability to teach and build curricula at the university level. Since 1995, the program has provided training opportunities for hundreds of agricultural educators across the developing world. Program alumni play an integral role in training the next generation of scientists and policymakers to better understand the global agricultural marketplace and support science-based trade policies. (<https://www.fas.usda.gov/programs/faculty-exchange-program>)

Established in 2018, the International Agricultural Education Fellowship Program provides fellowships to eligible U.S. citizens to assist developing countries in establishing school-based agricultural education and youth extension programs.

The program aims to:

- Develop globally minded United States agriculturists with experience living abroad;
- Help meet the food and fiber needs of the domestic population of eligible countries; and
- Strengthen and enhance trade linkages between eligible countries and the United States agricultural industry.

Candidates must hold a minimum of a bachelor's degree in an agriculture-related field and must understand U.S. school-based agricultural education and youth extension programs.

(<https://www.fas.usda.gov/programs/international-agricultural-education-fellowship-program>)

The Scientific Cooperation Exchange Program supports collaborative relationships between teams of scientific and technical experts from the United States and the People's Republic of China. Since 1979, the program has facilitated exchanges for thousands of participants on topics including food safety and security, animal and plant health, and agricultural

biotechnology and emerging technologies. The program helps to promote U.S. agricultural priorities, encourage long-term cooperation in agricultural science and technology, create a positive atmosphere for agricultural trade, and enhance overall relations between the United States and China. By helping U.S. and Chinese companies understand each other's products and needs, the program provides an avenue through which U.S. agricultural exports can play a role in the burgeoning Chinese economy. (<https://www.fas.usda.gov/programs/scientific-cooperation-exchange-program>)

The Scientific Cooperation Research Program supports joint research, extension, and education projects — lasting up to two years — between U.S. researchers and researchers from selected emerging market economies. The projects address issues including agricultural trade and market access, animal and plant health, biotechnology, food safety and security, and sustainable natural resource management. Since 1980, the program has supported hundreds of projects, enhanced the technical skills of agricultural professionals and helped beneficiary countries to be more competitive consumers of U.S. agricultural products. (<https://www.fas.usda.gov/programs/scientific-cooperation-research-program>)

The Scientific Exchange Program promotes trade, trade policy, trade capacity building, and food security. The program aims to educate a new generation of agricultural scientists, increase scientific knowledge and collaborative research, and extend knowledge to users and intermediaries in the international agricultural marketplace. USDA may also use the program as a market development tool to assist in opening markets and decreasing or eliminating trade barriers, which ultimately increases and creates new opportunities for U.S. agricultural exports.

Candidates must hold a minimum of a Master's-level degree, be in the early or middle stage of their career, and represent a university, government agency or research entity in their home country. (<https://www.fas.usda.gov/programs/scientific-exchanges-program>)

Agency Senior Executive meeting schedules and briefing materials

FAS employees use FCRM Cloud to collect information needed to manage the Agency Senior Executives' meeting schedules and briefing materials. Meeting and briefing materials are divided into individual tasks and assigned to FAS employees. Employees collaborate to create, edit, review, and approve the schedule and materials. The materials are published from FCRM Cloud and carried to the meeting.

Dairy Import Licensing Program

Import licensing is one of the tools USDA uses to administer the tariff-rate quota (TRQ) system for U.S. imports of dairy products. For dairy products subject to TRQs, importers are generally required to obtain a license from FAS to take advantage of low-tier tariff rate. Importers must apply for a license annually between Sept. 1 and Oct. 15.

Under the TRQs, the low-tier rate applies to imports up to a specified quantity. A high-tier rate applies to any imports in excess of that amount. No license is required to import products at the high-tier rate, to import products for an agency of the U.S. government, or to import products for personal use, if net weight does not exceed 5 kilograms (11 pounds) in any one shipment.

Sugar Import Program

Imports of sugar into the United States are governed by tariff-rate quotas (TRQ), which allow a certain quantity of sugar to enter the country under a low tariff. TRQ apply to imports of raw cane sugar, refined sugar, sugar syrups, specialty sugars and sugar-containing products. Import restrictions are intended to meet U.S. commitments under the North American Free Trade Agreement (NAFTA) and the Uruguay Round Agreement on Agriculture (which resulted in the creation of the World Trade Organization).

USDA establishes the annual quota volumes for each federal fiscal year (beginning October 1) and the U.S. Trade Representative allocates the TRQs among countries. Sugar and related products paying a higher, over-quota tariff may enter the country in unlimited quantities.

FAS employees use FCRM Cloud to administer the TRQ in the Sugar Import Program.

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

None

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

FCRM Cloud does not use commercial data and does not use publicly available. The system uses data collected from the USDA employees or the Program participants.

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

The cloud software provider has implemented and assessed all the security controls necessary to operate a FISMA High system. These security controls exceed the needs of FCRM Cloud. USDA eAuthentication provides the appropriate authorization and access needed for both FAS employees and the public.

Section 3.0 Retention

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

3.1 How long is information retained?

1) Administrative internal control management records.

Destroy 1 year after submission or when superseded, as appropriate, but longer retention is authorized if required for business use.

DAA- 2020-0001-0001

2) Customer/client records.

Distribution lists used by an agency to deliver specific goods or services. Records include:

- contact information for customers or clients
- subscription databases for distributing information such as publications and data sets produced by the agency
- files and databases related to constituent and community outreach or relations
- sign-up, request, and opt-out forms

Temporary. Delete when superseded, obsolete, or when customer requests the agency to remove the records.

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

Yes

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

An undefined retention period results in a retention period that is longer than needed, and this extends the period that the data is exposed to the risk of data misuse or loss. The cloud software provider provides encryption of data at rest, in transit, and data loss prevention measures that exceed the needs of FCRM Cloud.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

None

4.2 How is the information transmitted or disclosed?

Not applicable. The information is not shared with internal organizations.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Not applicable. The information is not shared with internal organizations.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

Information is shared with the US Treasury Department. The information shared with the US Treasury Department in the Billing Identification Number (BIN) and amount due for fees. The BIN is a unique identifier common to USDA and Treasury. The BIN is associated to unique Company name, Contact name, Contact email address, and Company address records stored on both the Treasury information system (Pay.gov) and FCRM Cloud. The Company name, Contact name, Contact email address, and Company address records are collected and used by Treasury and they do NOT use FCRM Cloud to collect this data.

USDA transmits to Treasury a BIN and amount due. Treasury returns later a BIN and an acknowledgement that the amount due was paid. When considering the service provide by the government to dairy importers through the Dairy Import Program, financial information is ONLY stored in the US Treasury Department system.

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

Personal Identifiable Information is not shared outside the Department using FCRM Cloud.

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

USDA transmits to Treasury a BIN and amount due using encryption and by regularly sharing updated certificates. The BIN and amount due is sent from USDA to Treasury from information system to information system. Encryption used is: AES-256- AES encryption is compliant with FIPS 140-2. It's a symmetric encryption algorithm that uses cryptographic key lengths of 128, 192, and 256 bits to encrypt and decrypt a module's sensitive information.

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

USDA transmits to Treasury a BIN which can only be matched to privacy information using records protected inside USDA and Treasury systems. These records are protected at rest in each Department.

Section 6.0 Notice

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

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

Dairy Import Program:

<https://www.govinfo.gov/content/pkg/FR-2008-05-07/pdf/E8-10006.pdf>

Fellowship and Exchange Programs:

<https://www.govinfo.gov/content/pkg/FR-2022-07-12/pdf/2022-14842.pdf>

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

Yes

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

Yes

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

It is listed directly in the SORN for Dairy Import Program and Fellowship and Exchange Programs:

Dairy Import Program:

RECORDS ACCESS PROCEDURES: Individuals who wish to gain access to or amend their own records should contact the Dairy Import Licensing Group, Mail Stop 1021, 1400 Independence Avenue, SW., Washington, DC 20250–1021.

Fellowship and Exchange Programs:

RECORD ACCESS PROCEDURES: Individuals seeking notification of and access to any record contained in this system of records, or seeking to contest its content, may submit a request in writing to the Foreign Agricultural Service FOIA/Privacy Act Officer, whose contact information can be found at <https://www.dm.usda.gov/foia/poc.htm>. If an individual believes more than one component maintains Privacy Act records concerning him or her, the individual may submit the request to the Chief FOIA Officer, Department of Agriculture, 1400 Independence Avenue SW, South Building Room 4104, Washington, DC 20250–0706, email: USDAFOIA@ocio.usda.gov

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

Notice is provided to individuals through the Federal Register. The risk of individuals being unaware is not additionally mitigated.

Section 7.0 Access, Redress and Correction

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

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

The Dairy Import Program and Sugar Import Program each provide the public a Company Portal. Approved and authorized company contacts can login and gain access to their information. Participants of the Fellowship and Exchange Programs needs to contract FAS directly.

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

Approved and authorized company contacts in the Dairy Import Program and Sugar Import Program can login and correct their information. Participants of the Fellowship and Exchange Programs needs to contract FAS directly.

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

No notification is given to individuals.

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

Individual program administrators and staff are available by phone and email to provide an alternative means of redress.

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

PII may become out of date or inaccurate. Risk is not mitigated.

Section 8.0 Technical Access and Security

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

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

FAS supervisors select FAS employees for access based on least privilege to perform duties. Company ownership is documented outside of FCRM Cloud, and company owners identify company employees or agents, and their least privileges needed to perform company duties in the Dairy Import Program and Sugar Import Program.

8.2 Will Department contractors have access to the system?

No

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

PII training is included in the yearly mandatory Information Security Awareness (ISA) Training.

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

Yes

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

The cloud software provider provides auditing, encryption of data at rest, in transit, and data loss prevention measures that exceed the needs of FCRM Cloud. These security controls are detailed in the cloud software provides system security plan and are not available to FAS.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?

None. The security controls inherited from the cloud software provider are greater than what is needed, but efficiently provide the entire USDA enterprise quality security controls.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

The system is a FedRAMP cloud Software as a Service (SaaS).

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

No

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?

Yes

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

None

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

None

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

None

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

N/A

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

N/A

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

N/A

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

N/A

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

N/A

10.10 Does the system use web measurement and customization technology?

No

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

N/A

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

N/A