

# **Privacy Impact Assessment (PIA)**

## **Conservation Delivery Streamlining Initiative (CDSI CDSI-NITC)**

**Technology, Planning, Architecture, & E-Government**

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# **Privacy Impact Assessment for the**

## **Conservation Delivery Streamlining Initiative (CDSI)**

**September 2020**

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## **Abstract**

The Conservation Delivery Streamlining Initiative (CDSI) application suite of NRCS helps the NRCS field staff and NRCS customers in delivering conservation services efficiently.

This PIA is being conducted to comply with Federal Information Security Management Act (FISMA) of 2002 and the E-Government Act of 2002 (Public Law. 107-347, 116 Stat. 2899, 44 U.S.C. § 101, H.R. 2458/S. 803) Federal Law.

## **Overview**

The Conservation Delivery Streamlining Initiative (CDSI) includes the following components:

### **Conservation Client Gateway (CCG)**

The purpose of the CCG is to allow clients to learn about available NRCS programs, request assistance with their conservation problems, and communicate/collaborate with the NRCS during the planning and financial assistance processes. CDSI requires eAuthentication (eAuth) Level 2 for access. Clients must have, or obtain, this access to use the CCG component.

### **Conservation Desktop Financial Assistance (CD-FA)**

The purpose of CD-FA is to integrate with NRCS' existing financial assistance programs contract management application, ProTracts. CD-FA, a ProTracts hybrid, provides workflow and tasking between NRCS staff and NRCS' public-facing CCG application. The tasking and workflows cover the full set of NRCS contract management business processes from application to practice certification. CD-FA also provides integrated electronic document storage capabilities for a select set of financial assistance program documents.

### **Conservation Desktop Technical Assistance (CD-TA)**

The purpose of CD-TA is to support the various steps of the conservation planning process. CD-TA incorporates fully operational versions of the CDSI proof-of-concept effort (including integration with NRCS applications, databases and services; geospatial data development and visualization; tasking and workflow management together with electronic document storage).

### **CDSI - Easements/Highly Erodible Land Conservation (HELIC)/Wetland Conservation (WC)**

The purpose of HELIC/WC is to integrate managing and tracking of HELIC determinations and WC requests in CD for identifying land eligibility and compliance. The integrated CD-FA Easements is to ensure all easement-related Toolkit functionality is available in CD and to phase out the National Easements Staging Tool (NEST). It also provides new and improved FA ledger/ Financial Management Modernization Initiative (FMMI) interactions for easements funds management.

### **Conservation Assessment Ranking Tool (CART)**

The purpose of CART is to provide an objective ranking of conservation program funding requests. CART will be used to allocate \$2 billion to private landowners in a 12-month period of time.

## Section 1.0 Characterization of the Information

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

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

*CDSI maintains documents that are secure. Potential Personally Identifiable Information (PII) found in the documents includes:*

- *Contact information (name, address, phone, email address) for public applicants who have submitted an application. CDSI does not maintain contact information that information is maintained in the Service Center Information Management System (SCIMS).*
- *Limited information for NRCS employees and affiliates who are involved with these applications. CDSI does not disseminate PII information to any other system.*

*Note: CDSI does not process any financial transactions and does not transmit any information to the Financial Management Modernization Initiative (FMMI). This is handled in ProTracts.*

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

*SCIMS is the source of the applicant's PII used in CDSI. PII is also collected by NRCS personnel into "wizard" forms (not within CDSI), either directly or transcribed from paper application forms. (Wizard forms are data entry forms that move the user to the next form location based on previous entries.)*

*CDSI collects information directly from the affected members of the public (i.e., landowners). CDSI does not process any financial transactions and will never share any type of PII with FMMI (financial transactions are not a function of the current version of CDSI). CDSI only presents a view of disbursements that are maintained in ProTracts.*

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

*Data collected by the CDSI application will be used by NRCS staff (usually working with clients) and clients (i.e. farmers, ranchers, landowners, and other NRCS customers) to learn about available NRCS programs, request assistance with their conservation problems, and communicate/collaborate with the NRCS during the planning and financial assistance processes. It is also used to support the various steps of the conservation planning process and to integrate with NRCS' existing FA programs contract management application for improved efficiency in service delivery.*

*The information is collected, used, and maintained to aid farmers, ranchers, landowners and other customers of NRCS who interact with the conservation planners and other specialists at the NRCS.*

### **1.4 How is the information collected?**

*Information is collected by NRCS users who upload the documents and is transmitted from Document Management System (DMS) and SCIMS by web services. In addition, PII is collected by NRCS personnel into "wizard" forms, either directly or transcribed from paper application forms. This is not done within CDSI.*

### **1.5 How will the information be checked for accuracy?**

*Information in CDSI is reviewed for accuracy and is verified through manual review and comparison with existing agency data throughout the approval process. This is done by NRCS personnel who have the requisite knowledge of, and responsibility for, the data.*

*The accuracy of PII obtained from SCIMS is not within the scope of CDSI as CDSI does not have the ability to update any information in SCIMS.*

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

*The following regulations are applicable:*

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

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

*CDSI collects PII directly from landowners and is only accessible by authenticated users; however, there is an insignificant risk that an un-authenticated user could gain access to the application. The only PII in the application that poses privacy risks is the minimal amount of PII that is used to identify stakeholders who are involved in new and existing applications. This is further discussed in the Overview and Section 1.1.*

*Privacy risks are mitigated because access to the information is limited to appropriate NRCS personnel and partners through the use of the eAuth application, which provides user authentication for NRCS. Other access requirements include the need for users to be on the USDA network backbone, using a Common Computing Environment (CCE) computer and via NRCS' role-based authorization.*

*Please see Sections 2 and 8 for a further discussion of security controls that are in place to mitigate privacy risks.*

## **Section 2.0 Uses of the Information**

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

### **2.1 Describe all the uses of information.**

*This information is used to identify farmers, ranchers, landowners, and other customers of NRCS interacting with conservation planners and other specialists at the NRCS.*

*Data collected by the CDSI application will be used to respond to requests for assistance with applicant's conservation problems, communicate/collaborate with NRCS during the planning and financial assistance processes, support the various steps of the conservation planning process; and to integrate NRCS' existing financial assistance programs contract management.*

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

*N/A. CDSI does not use any type of tools to analyze data. In addition, no data is produced, manipulated, or reformatted.*

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

*N/A: No commercial or publicly available data is maintained in CDSI.*

### **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.**

*This application is in compliance with the FISMA and the security and privacy controls provided in the U.S. National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Revision 4.*

*If any residual risks are identified, they will be managed and reported via the FISMA mandated risk assessment processes.*



## Section 3.0 Retention

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

### 3.1 How long is information retained?

*All information contained will be retained in compliance with NARA Guidelines, which vary on average in years from less than one year to more than ten years according to the NARA General Records Schedules Transmittal 29, issued December 2017.*

*Per the NRCS-1 System of Record Notice (SORN), “Records are maintained as long as the owner, operator, producer, or participant qualifies for conservation programs.”*

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

*Yes. Per NARA Code of Federal Regulations - 36 CFR 1220, Subchapter B – Records Management and USDA OCIO Department Regulation 3080-001 accessible at: <http://www.ocio.usda.gov/document/departmental-regulation-3080-001>*

*NARA Approval: NARA approval is required for all official records schedules. SF-115 shall be submitted to NARA for approval. External approval has already been granted for records covered by the General Records Schedules (GRS). No external approval is required for the disposition of non-record materials. An informational copy of the SF-115, in both hard copy and electronic format, shall be provided to the Departmental Records Officer at the same time that the original is sent to NARA.*

*Electronic Records: Electronic records should be scheduled in the context of entire information systems, along with appropriate documentation and related indexes, and provide the necessary elements:*

- *All input records or source documents.*
- *All information recorded on electronic media.*
- *All output records.*
- *The documentation associated with the system.*
- *Any related indexes.*

*As with audiovisual and microform records, permanent electronic records should not be proposed for long-term storage at Federal records centers but should be transferred directly to the National Archives.*

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

*Retention of application-specific data is required to meet business and organizational requirements for this particular information system. The risks associated with retaining application-specific information are mitigated by the controls discussed above.*

## Section 4.0 Internal Sharing and Disclosure

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

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

*N/A. Information is not shared with other internal USDA organizations. Data will only be shared with defined NRCS business sponsors or stakeholders. While CDSI obtains transitory information related to some landowners from SCIMS, CDSI does not maintain this information in the application database. Furthermore, CDSI does not share or transmit any information with SCIMS nor does it update any information in SCIMS.*

*Customer requests to update their SCIMS profiles are saved to an NRCS enterprise database outside the CDSI accreditation boundary. The information is retrieved from, and viewed in, CDSI by authorized NRCS personnel. Personnel then login to SCIMS and input the information using the Farm Service Agency (FSA) SCIMS application.*

*Note: CDSI does not have a Service Level Agreement (SLA) with SCIMS. However, SCIMS is the official repository of customer information used by NRCS and other USDA agencies. The ultimate use of the information from SCIMS is to provide linkage to applications already using SCIMS. SCIMS is outside the accreditation boundary of CDSI. Information is put into the FSA SCIMS application through FSA-owned application screens. The FSA does not allow NRCS or other agencies to have write access to any of their databases. Read-only access is through screens or services that FSA provides.*

### 4.2 How is the information transmitted or disclosed?

*N/A. Information is not shared with other internal USDA organizations. Data will only be shared with defined NRCS business sponsors or stakeholders.*

*Information is sent by CDSI Integration Services to enterprise databases (such as NPAD) that are outside the accreditation boundary of CDSI. The essential function of CDSI is to allow customers to view their own information for multiple applications without the necessity of a trip to the field office. By transferring any input data to enterprise databases, CDSI does not maintain ownership of any data it receives from the clients. The existing applications have established access controls and data protection for customer information.*

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

*Privacy risks are mitigated by not sharing information with other internal USDA organizations. Any residual risks are mitigated by the controls discussed in Section 2.4.*

## Section 5.0 External Sharing and Disclosure

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

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

*N/A. Information is not shared with organizations external to NRCS.*

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

*N/A. Information is not shared with organizations external to NRCS. This application is subject to the NRCS-1 SORN accessible at:*

<https://www.ocio.usda.gov/sites/default/files/docs/2012/NRCS-1.txt>

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

*N/A. Information is not shared with organizations external to NRCS.*

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

*Privacy risks are mitigated by not sharing information with organizations external to the USDA. Any residual risks are mitigated by the controls discussed in Section 2.4.*

## 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?

*Yes. This application is subject to the NRCS-1 SORN accessible at:  
<https://www.ocio.usda.gov/sites/default/files/docs/2012/NRCS-1.txt>*

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

*N/A. No notice is provided to any individual landowner directly within the CDSI application itself. The collection of PII is done prior (via eAuth Levels 1-2 which are transferred to SCIMS). The individual landowner must agree to the CDSI usage of the SCIMS data in order to access CDSI. In this sense, notice is provided/required. The only collection of PII is the confirmation of existing PII as correct or requesting a change in incorrect PII.*

*The NRCS CPA-1200 form requests financial/technical support from NRCS and is presented with pre-populated SCIMS information (based on a SCIMS ID). All fields, other than contact information, are maintained outside the accreditation boundary.*

*Refer to the USDA NRCS Privacy Policy accessible at:*

*[https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/about/?cid=nrcsdev11\\_000885](https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/about/?cid=nrcsdev11_000885)*

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

*Yes; however, access to the application is then denied. Applicants must provide CCG their information if they want to participate. Consent to use an individual's information is required in order to input the information into the application.*

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

*N/A. The PII that is collected from any landowner by CDSI is on the individual landowner's request and is used for the changing of incorrect data.*

**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.**

*There is no risk that any landowner would be unaware of collection, because the landowner is required to manually enter the data being collected.*

## Section 7.0 Access, Redress and Correction

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

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

*As published in SORN USDA/NRCS-1: "Any individual may request information regarding this system of records, or information as to whether the system contains records pertaining to him/her by contacting the respective district conservationist or other designee. If the specific location of the record is not known, the individual should address his/her request to the Director, Management Services Division, USDA-Natural Resources Conservation Service, P. O. Box 2890, Washington, DC 20013, who will refer it to the appropriate field office. A request for information pertaining to an individual should contain: Name, address, and other relevant information (e.g., name or nature of program, name of cooperating body, etc.)."*

*Any PII obtained from SCIMS would be subject to the applicable procedures to allow individuals to gain access to their SCIMS information, as maintained by the FSA. Note that the applicable procedures to allow individuals to gain access to their SCIMS information are maintained outside of the accreditation boundary of this application by SCIMS.*

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

*The individual landowners associated with plans and agreements can gain access to CDSI through eAuth and a role based mechanism, so any PII in CDSI is available to the individual landowners themselves (i.e., members of the public) to request updates or changes (i.e., correct) to any inaccurate or erroneous PII. An individual may make a request to correct information through CCG; however, any actual information correction takes places in SCIMS.*

*As published in SORN USDA/NRCS-1: "Any individual may request information regarding this system of records, or information as to whether the system contains records pertaining to him/her by contacting the respective district conservationist or other designee. If the specific location of the record is not known, the individual should address his/her request to the Director, Management Services Division, USDA-Natural Resources Conservation Service, P. O. Box 2890, Washington, DC 20013, who will refer it to the appropriate field office. A request for information pertaining to an individual should contain: Name, address, and other relevant information (e.g., name or nature of program, name of cooperating body, etc.)."*

*Any PII obtained from SCIMS would be subject to the applicable procedures to allow individuals to gain access to their SCIMS information, as maintained by the FSA. Note*

*that the applicable procedures to allow individuals to gain access to their SCIMS information are maintained outside of the accreditation boundary of this application by SCIMS.*

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

*N/A. No notification is provided related to procedures to allow individual landowners to correct their PII. No PII is collected from any landowner by CDSI. Note that the applicable procedures to allow individuals to gain access to correct their SCIMS information are maintained outside of the accreditation boundary of CDSI by SCIMS (owned by the FSA), which is the source of some of the PII used by this application. The SORN USDA/NRCS-1 is published on the USDA.gov website.*

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

*N/A. Refer to Section 7.3.*

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

*There are no privacy risks specifically associated with the redress process for this application.*

*As published in SORN USDA/NRCS-1: “Any individual may request information regarding this system of records, or information as to whether the system contains records pertaining to him/her by contacting the respective district conservationist or other designee. If the specific location of the record is not known, the individual should address his/her request to the Director, Management Services Division, USDA-Natural Resources Conservation Service, P. O. Box 2890, Washington, DC 20013, who will refer it to the appropriate field office. A request for information pertaining to an individual should contain: Name, address, and other relevant information (e.g., name or nature of program, name of cooperating body, etc.).”*

*Residual privacy risks associated with the redress process for individuals are mitigated since individuals can use the relevant procedures discussed above to update their original public records.*



## **Section 8.0 Technical Access and Security**

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

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

*Access to CDSI is determined via a Level 2 eAuth ID and password on a valid need-to-know basis, determined by requirements to perform applicable official duties. CDSI has documented Access Control (AC) Procedures, in compliance with FISMA and USDA directives. Please refer to Section 2.4 for further information.*

### **8.2 Will Department contractors have access to the system?**

*Yes. Department contractors with a need-to-know will have access to CDSI as part of their regular assigned duties. Contractors are required to undergo mandatory background investigations commensurate with the sensitivity of their responsibilities, in compliance with Federal requirements.*

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

*Annual organizational Privacy Awareness Training is mandatory for all NRCS personnel. NRCS requires that every employee and contractor receive information security awareness training before being granted network and account access, per General Manual, Title 270, Part 409 - Logical Access Control and Account Management. Annual Security Awareness and Specialized Training is also required, per FISMA and USDA policy, and is tracked by USDA.*

*To remind users of their responsibilities (which they acknowledged during their Annual Security Awareness Training), the application reiterates that documents passed to Document Management System (DMS) may contain sensitive information, and this information must not be disclosed to anyone unless the recipient has a direct need-to-know in the performance of their official duties.*

### **8.4 Has Certification & Accreditation (C&A) been completed for the system or systems supporting the program?**

*Yes. CDSI has an ATO that expires on 01/05/2021.*

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

*NRCS complies with the FISMA of 2014. Assessment and Accreditation (A&A), as well as annual key control self-assessments and continuous monitoring procedures are implemented for PDS per the requirements given in NIST SP 800-53 Revision 4. The system also provides technical safeguards to prevent misuse of data including the following:*

- *Confidentiality: Encryption is implemented to secure data at rest and in transit for PDS [e.g., by Federal Information Processing Standards (FIPS) 140-2 compliant HTTPS and end-user hard disk encryption]. The documents that are passed to, and maintained in, DMS are encrypted in transit.*
- *Integrity: Masking of applicable information is performed for PDS (e.g., passwords are masked by eAuth).*
- *Access Control: PDS implements least privileges and need-to-know to control access to PII [e.g., by Role-Based Access Control (RBAC)].*
- *Authentication: Access to the system and session timeout is implemented for PDS (e.g. by eAuth and via multi-factor authentication for remote access).*
- *Audit: Logging is implemented for PDS [there is a logging infrastructure including Application Audit Log Solution (AALS)]. PDS logs events from various devices within its accreditation boundary to include web servers and database servers. NRCS logs data transactions from devices adjacent to the PDS accreditation boundary to include the legacy databases and the CA Application Programming Interface (API) Gateway. Logged events will be stored in the NRCS Security Information and Event Management (SIEM) server.*
- *Attack Mitigation: The system implements security mechanisms such as input validation.*

*Note: For the privacy notice control, please see Section 6 which addresses notice. For the privacy redress control, please see Section 7 which addresses redress.*

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

*CDSI does not directly collect any PII from any landowner or share (internally or externally) any PII; however, it does utilize PII within the system which is obtained from other sources (refer to Section 3.0). Data extracts containing PII are not regularly obtained from the system, therefore, privacy risk from this area is limited and addressed through Information Technology (IT) data extract process controls.*

*Any privacy risks identified in this system are mitigated by the security and privacy safeguards provided in Section 8.5 and by the security controls discussed in Section 2.4. Remediation of privacy risks associated with internal/external sharing are addressed in Sections 4 and 5 respectively. Remediation of privacy risks associated with notice and redress are addressed in Sections 6 and 7 respectively.*

*Mitigation occurs through policies that address Separation of Duties (SOD) which ensures that system operators and system administrators have limited, if any, access to PII. In addition, NIST 800-53 Audit and Accountability (AU) audit controls are used to prevent data misuses.*

## **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?**

*CDSI is an NRCS application and is comprised of both front-end web applications and back-end compute/processing applications.*

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

*No. CDSI utilizes Agency-approved technologies and these technology choices do not raise privacy concerns.*

## **Section 10.0 Third Party Websites/Applications**

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

### **10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) Memorandums M-10-22 “M-10-22 Guidance for Online Use of Web Measurement and Customization Technologies” 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 3<sup>rd</sup> party websites and/or applications?**

*The separately accredited 3<sup>rd</sup> party eSignLive is used to allow clients to submit signed documents to CDSI components. CDSI combines the capabilities of CCG and eSignLive with CD-FA and CD-TA. The CDSI components share the same accreditation boundary and is hosted in the NITC.*

### **10.3 What Personally Identifiable Information (PII) will become available through the agency’s use of 3<sup>rd</sup> party websites and/or applications?**

*The document signers name is collected and stored within DMS.*

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

*An electronic signature will be used for the signing of documents.*

### **10.5 How will the PII that becomes available through the agency’s use of 3<sup>rd</sup> party websites and/or applications be maintained and secured?**

*The signed documents will be stored in DMS.*

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

*Signed documents will be stored consistent with records management policies; this activity is performed by DMS.*

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

*Signed documents are limited to the signer, internal use, and DMS.*

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

*Signed documents are limited to the signer and internal users.*

**10.9 Will the activities involving the PII that becomes available through the agency's use of 3<sup>rd</sup> party websites and/or applications require either the creation or modification of a SORN?**

*N/A. The documents are collected for uses that have been addressed under the NRCS SORN. The collected documents pass through CST, ProTracts - FundManager, and then to DMS - all of which fall under the NRCS SORN (which address the documents that use eSignLive).*

**10.10 Does the system use web measurement and customization technology?**

*N/A. CDSI does not use web measurement and customization technology.*

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

*N/A. CDSI does not use web measurement and customization technology.*

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

*Privacy risks of CDSI data becoming available via 3<sup>rd</sup> party websites are nominal. Both eSignLive and CDSI are accredited and hosted in NITC. In addition, CDSI does not use web measurement or customization technology.*

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