Privacy Impact Assessment

for

Natural Resource Manager (NRM)

Policy, E-Government and Fair Information Practices

Version: 3.0.0
Date: May 13, 2020
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Abstract

The following briefly describes the system that this Privacy Impact Assessment (PIA) is about:

The Natural Resource Manager (NRM) is a General Support System (GSS) that is inclusive of a suite of applications that are used for managing corporate agency data across the Forest Service. This system is defined to assist in field-level; data collection, inventories, treatments, timber sales, permit issuance, recreation use, analyses, and decision-making processes in support of the mission of the Forest Service.

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 system inclusive of a suite of applications that are used for managing corporate agency data across the Forest Service. This system is defined to assist in field-level data collection, inventories, treatments, timber sales, permit issuance, recreation use, analyses, reporting, and decision-making processes in support of the mission of the Forest Service.

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?


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: 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), Common Agreement Number (CAN), or Agency location Code (ALC)).

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, Vendor ID (may be one of the following: Employer Identification Number (EIN), Social
1.2 Source

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

Data Sources include:

The person needing the service/work that is being offered by the Forest Service (timber sales bids, special use permits, etc.), An FS employee entering the data from a form filled out by the person/company providing the information, Financial Management Modernization Initiative (FMMI). Sources used for data validation, Financial Management Modernization Initiative (FMMI), Central Contractors Registration (CCR), Office of Inspector General (OIG, Office of Management and Budget (OMB).

1.3 Justification

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

To:

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

Make payments to the person/company for work done

Ensure the 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?

Data is collected in the following ways:

In person

Over-the-counter at the local FS unit where transaction occurs

Required documentation forms (electronic or paper copy)

Mailed in form to the FS unit.

Entered directly into the application component

1.5 Validation

How will the information be checked for accuracy?

Grants & Agreements - Validations are performed against Central Contractors Registration (CCR) and National Finance Center (NFC)

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, i.e., driver’s license is viewed to be the face of the individual providing the license.

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:


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

2009 Omnibus Appropriations Act, Section 427 (Transfer Authority), P.L.111-8 SEC-427

7th Continuing Resolution for Fiscal Year 2003, P.L.107-294

Act of August 27, 1958, P.L.85-767


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

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

Interior and Related Agencies Appropriation Act of 1989, P.L.100-446


Interior and Related Agencies Appropriations Act of 1998, P.L.105-83
Economy Act of 1932, P.L.97-258

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

Federal Employees International Organization Service Act, 5 USC 3343

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


Interior and Related Agencies Appropriations Act of 2000 (Section 341 Stewardship), P.L.106-113


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

Omnibus Consolidated Rescissions and Appropriations Act of 1996, P.L.104-134

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

Southern Nevada Public Land Management Act of 1998, P.L.105-263

Title 7 United States Code, Department of Agriculture Reorganization, 7 USC, 6915

Treasury Department Appropriation Act of 1997, P.L.104-208

U.S. Information and Exchange Act, P.L.97-241

Interior and Related Agencies Appropriation Act of 2006, P.L.109-54

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


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

Title 40, USC, 501 Services for Executive Agencies, 40 USC 501

Title 40, USC 11101(6) Public Buildings, Property, and Works, 40 USC 11101

Title 40, USC 11302(e) for Information Technology, 40 USC 11302

Consolidated Appropriations Act 2008, P.L.110-161

Title 49, USC 5320, Section 3021 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act, 49 USC 5320

Department of Agriculture Organic Act of 1944 as amended (16 USC 580a), 16 USC 580A

Tax Relief and Health Care Act of 2006, Title III White Pine County Conservation, Recreation and Development, P.L.109-432


Food, Conservation, and Energy Act of 2008, Title IX ENERGY, Section. 9012-9013

Federal Property and Administrative Services Act of 1949; as amended (40 USC 471 et seq), 40 USC 101
1974: Forest development roads and trails, 23 USC 205 - SEC. 205

2009 Omnibus Appropriations Act, Section 418 (Service First Authority), P.L.111-8

Robert t. Stafford Disaster Relief and Emergency Assistance Act, P.L.93- 288

Interior and Related Agencies Appropriations Act of 2010, P.L.111-88


Use of Institute by Federal Agency or Entity, 20 USC 5607B

**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


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.


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:

Organic Administration Act of June 4, 1897, (16 U.S.C. 477-482, 551). This act authorizes the Secretary of Agriculture to issue rules and regulations for the occupancy and use of the National Forests. This is the basic authority for authorizing use of National Forest System lands for other than rights-of-way.

Preservation of American Antiquities Act of June 8, 1906, (16 U.S.C. 431 et seq.). This act authorizes permits for archeological and paleontological exploration involving excavation, removal, and storage of objects of antiquity or permits necessary for investigative work requiring site disturbance or sampling which results in the collection of such objects.


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. It requires annual payments in advance which represent fair market rental value and provides for reimbursement to the Government for administrative and other costs incurred in monitoring, construction (including costs for preparing required environmental analysis and documentation), operation, maintenance, and termination of oil and gas pipelines.
Bankhead-Jones Farm Tenant Act of July 22, 1937, as amended (7 U.S.C. 1010-1012). Title III of this act directs and authorizes the Secretary of Agriculture to develop programs of land conservation and use to protect, improve, develop, and administer the land acquired and to construct structures thereon needed to adapt the land to beneficial use. Under the act, the Department of Agriculture may issue leases, licenses, permits, term permits, or easements for most uses, except rights-of-way.


Section 7 of the Granger-Thye Act of April 24, 1950, (16 U.S.C. 490, 504, 504a, 555, 557, 571c, 572, 579a, 580c-5801, 581i-1). This act authorizes special-use permits not to exceed 30 years duration for the use of structures or improvements under the administrative control of the Forest Service and for the use of land in connection therewith, without acreage limitation.

Independent Offices Appropriation Act of 1952, as amended (31 U.S.C. 9701). This act provides authority for agency heads to charge fees for services or benefits provided by the agency that are fair and based on fair market value and cost to the Government. Office of Management and Budget (OMB) Circular No. A-25 further defines this authority and requires agencies to establish user fees based on sound business management principles.

Act of September 3, 1954, (68 Stat. 1146; 43 U.S.C. 931c, 931d). This act authorizes permits, term permits, leases, or easements at the fair market value, not to exceed 30-years duration, to States, counties, cities, municipalities, or other public agencies without acreage limitation for the construction and operation of public buildings or other public works, exclusive of rights-of-way.

Highway Act of August 27, 1958, (23 U.S.C. 317), supplemented by the Act of October 15, 1966 (49 U.S.C. 1651). This act authorizes the Federal Highway Administration to grant easements to States for highways that are part of the Federal-aid system or that are constructed under the provision of Chapter 2 of the Highway Act.

The Forest Service consents to the grant of these easements in a form agreed upon by the two agencies and upon the State highway agency's execution of stipulations. This is the only authority for granting rights-of-way for projects on the Federal-aid system or projects constructed under the provisions of Chapter 2 of the Highway Act (FSM 2731).

Wilderness Act of September 3, 1964 (16 U.S.C. 1131-1136). This act establishes requirements for special-use authorizations in designated
wilderness areas for temporary structures, commercial public services and access to valid mining claims and non-Federal lands. Under this act, Presidential approval is necessary for the establishment of new water facilities, power projects, and transmission lines.

Except for the Alaska National Interest Lands Conservation Act of December 2, 1980, this act is the exclusive authority for rights-of-way occurring within designated wilderness areas.

Land and Water Conservation Fund Act of September 3, 1964, as amended (16 U.S.C. 4601-6a(c)). Section 4(c) of this act authorizes permits for recreation, such as group activities, organized events, motorized recreational vehicle use, and other specialized recreation activities of limited duration.

National Forest Roads and Trails Act of October 13, 1964, (16 U.S.C. 532-38). This act authorizes the Secretary of Agriculture to grant temporary or permanent easements to landowners who join the Forest Service in providing a permanent road system that serves lands administered by the Forest Service and lands or resources of the landowner. It also authorizes the grant of easements to public road agencies for public roads that are not a part of the Federal-aid system (FSM 2732).

The Act of November 16, 1973, (30 U.S.C. 185). This act, amending Section 28 of the 1920 Mineral Leasing Act, authorizes the Forest Service to issue authorizations for oil and gas pipelines and related facilities located wholly on National Forest System land. When the lands are under the jurisdiction of two or more Federal agencies, authority for issuance is reserved to the Department of the Interior, Bureau of Land Management, subject to approval by the agencies involved.

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. FLPMA directs the United States to receive fair market value unless otherwise provided for by statute and provides for reimbursement of administrative costs in addition to the collection of land use fees (43 U.S.C. 1764(g)).

a. Except in designated Wilderness Areas, Alaska, and specifically accepted situations, FLPMA is the only authority for all forms of use involving:

Transportation, distribution, or storage of water.

Transportation, distribution, or storage of liquids or gases other than water and other than oil, natural gas, synthetic liquid, or gas fuels, or their refined products.
Transportation of solid materials and associated facilities for storing such materials.

Generation, transmission, and distribution of electrical energy.

Transmission or reception of electronic signals and other means of communication.

Transportation facilities outside of wilderness, except those rights issued in connection with commercial recreation facilities, authorized by the Federal Highway Act (FSM 2731), or the National Forest Road and Trail Act (FRTA) of October 13, 1964 (FSM 2732). The FLPMA is also used for granting rights-of-way to those otherwise qualified for FRTA easements, but who elect to pay a road-use fee at the time of commercial hauling instead of paying their share of road costs at the time the easement is issued. For further direction of FLPMA road rights-of-ways see FSM 2733.

Other transportation systems or facilities that are in the public interest, including those that would arise from future technological advances.

b. Section 504g of Title V (Public Law 98-300) exempts facilities financed through the Rural Electrification Administration from Federal land use fees. This section also provides for recovery of administrative costs from those uses.

c. Section 501(b)(3) of Title V (Act of October 27, 1986; 100 Stat. 3047; commonly referred to as "Colorado Ditch Bill") expanded the authority of the Secretary of Agriculture to:

Issue free conditional easements for certain water conveyance systems crossing National Forest System lands;

Authorize lump-sum payments for uses on National Forest System lands; and

Administer uses on National Forest System lands authorized under previous acts that were granted or issued by the Secretary of the Interior.

American Indian Religious Freedom Act of August 11, 1978 (42 U.S.C. 1996). This act states the policy of the United States to preserve and protect the rights of Native Americans to reasonable access and use National Forest System lands for exercising their traditional cultural religious beliefs and practices. This act does not grant authority to issue authorizations.

Archeological Resources Protection Act of October 31, 1979, (16 U.S.C. 470aa). This act authorizes the Secretary of Agriculture to issue permits for archeological research, investigations, studies, and excavations.
a. The Alaska National Interest Lands Conservation Act (ANILCA) provides numerous authorities related to access that are specific to National Forests in Alaska (except for sec. 1323(a), which applies to all National Forest System lands; see the following paragraph b). The Regional Forester, Region 10, shall prepare Manual supplements providing necessary direction for Alaska.

b. The provisions of section 1323(a) (16 U.S.C. 3210) apply to all National Forest System lands. This section provides that, subject to terms and conditions established by the Secretary of Agriculture, the owners of non-Federal land within the National Forest System shall be provided adequate access to their land. Regulations implementing section 1323(a) are set forth at Title 36, Code of Federal Regulations, Part 251, Subpart D - Access to Non-Federal Lands. See FSM 2701.3, paragraph 3, for the summary of the provisions of 36 CFR 251, Subpart D.

Federal Timber Contract Payment Modification Act of 1984, (16 U.S.C. 618). Section 3 of this act authorizes a waiver of all or part of a land use fee for an organizational camp operated by the Boy Scouts of America or other nonprofit organizations when they provide services the authorized officer determines are a valuable benefit to the public or programs of the Secretary of Agriculture.

National Forest Ski Area Permit Act of 1986, (16 U.S.C. 497b). This act authorizes use for up to 40 years and acreage size deemed appropriate by the authorized officer for nordic and alpine ski areas and facilities.

Omnibus Parks and Public Lands Management Act of 1996, (16 U.S.C. 497c). Section 701 of this act:

a. Establishes a system to calculate fees for ski area permits issued under the National Forest Ski Area Permit Act of 1986, (16 U.S.C. 497b),

b. Provides for holders of ski area permits issued under other authorities to elect this permit fee system (FSH 2709.11, sec. 38.03a),

c. Includes provisions concerning compliance with the National Environmental Policy Act when issuing permits for existing ski areas (FSM 2721.61f and FSH 2709.11, sec. 41.61b), and

d. Withdraws leasable and locatable minerals, subject to valid existing rights (FSH 2709.11, sec. 41.61c).

Act of May 26, 2000, (16 U.S.C. 406l-6d). This act supplements the authority of the Secretary of Agriculture to regulate commercial filming and still photography on National Forest System lands. It also authorizes the Secretary to retain and spend land use fees collected for commercial filming and still photography without further appropriation, and provides for recovery of
administrative and personnel costs in addition to the collection of the land use fee.


2701.2 - Repealed Statutory Authorities That Remain Applicable

The following acts which authorized the use of Federal land have been repealed. However, uses on National Forest System lands which were authorized under these authorities must continue to be administered in accordance with their terms and conditions. Refer to FSM 5520 for management direction.

The Act of July 26, 1866, (14 Stat. 254; 30 U.S.C. 51). This act granted rights-of-way for the construction of ditches and canals for water to be used for mining, agriculture, manufacturing, or other purposes.

The Act of March 3, 1875, as amended by the Act of March 3, 1899 (43 U.S.C. 934-939; 16 U.S.C. 525). This act granted rights-of-way to railroads for 100 feet on each side of the center line of the road; use of land for associated facilities, not to exceed 20 acres; and the right to take earth, stone, and timber necessary for railroad construction.

The Act of March 3, 1891, (26 Stat. 1096; codified in scattered sections of 43 U.S.C.). This act granted rights-of-way for irrigation to any canal or ditch company organized under the State or Territory law. It requires that the survey of the canal location be filed with the land office and construction be completed within 5 years.

The Act of February 15, 1901, (31 Stat. 790; codified in scattered sections of 16 and 43 U.S.C.). This act authorized the Secretary of the Interior to permit the use of rights-of-way through the public lands, forests, and other reserves of the United States for electrical plants and power and telephone transmission lines; and for canals, and ditches to promote irrigation, mining, manufacturing, or the supplying of water for domestic, public, or any other beneficial uses.

The Act of February 1, 1905, (16 U.S.C. 524). This act granted rights-of-way for the storage and transportation of water for municipal and mining purposes and for milling and reduction of ores.

electrical poles and lines for the transmissions and distribution of electrical power and communications purposes.

2701.3 - Regulations

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; rental fees; fee waivers; termination, revocation, suspension, and modification of existing authorizations; and permit administration.

Title 36, Code of Federal Regulations, Part 251, Subpart C. This subpart provides a process for appeals of decisions related to administration of special use authorizations on National Forest System lands.

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, the terms and conditions that govern any special use authorization that is issued by the Forest Service to permit such access, and the criteria that authorized officers must consider in evaluating such applications. The rules provide that, subject to the terms and conditions set out in the rules, "landowners shall be authorized such access as the authorized officer deems to be adequate to secure them the reasonable use and enjoyment of their land."

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 continuation of visitor services offered as of January 1, 1979, and 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.

**Special Forest Products (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 site 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, are there 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) Reporting (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.

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: Central Contractor Registration (CCR) is used to validate Data Universal Numbering System (DUNS) registration

Mineral Materials: N/A

Range: N/A

Special Uses (SUDS): 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.

3.2 Approval

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

Yes, NRM Business 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. This is another reason NRM stores the data indefinitely.

3.3 Risk Mitigation

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

Paper copies may be accessible to others when they are needed. Paper copies are kept locked up for 25 years and destroyed by shredding at that time.
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 - shares with USDA-OCIO, 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 FMMI system in order to make payments and to collect money that is due the Forest Service.

- Range - shares with USDA-OCIO, 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 FMMI.

- TIM - shares with USDA-OCIO, Name Address, and Vendor ID (may be one of the following: Employer Identification Number (EIN), Social Security Number (SSN), or Taxpayer Identification Number (TIN). The financial information is sent to the Financial Management Modernization Initiative (FMMI) in order for National Finance Center to make payments.

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 (fsftp2).

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.
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 Census: 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. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

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

Grants and Agreements: USDA/OFM-03

Mineral Materials: USDA/OFM-03, USDA/FS-16

5.3 Delivery and Security Measures

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

Grants and Agreements, Mineral Materials, Range, Special Uses (SUDS), Tim: N/A
5.4 Risk Mitigation

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

Grants and Agreements, Mineral Materials, Range, Special Uses (SUDS), Tim: 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 and if so, please provide SORN name and URL?

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

Yes.

USDA/FS-16

USDA/OFM-03

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 bases; 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.

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 name changes can't be made as this requires a new application and permit.
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. Users 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. Users 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. Users 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. Users 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, 2019.

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.
Privacy Impact Assessment

Responsible Official

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

Approval Signature

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Cynthia Towers
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