Privacy Impact Assessment for the
ZedX Bellefonte Datacenter

NCSU-APHIS Plant Pest Forecasting System
(NAPPFAST)

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Abstract

This Privacy Impact Assessment (PIA) is for the ZedX Inc. Bellefonte Datacenter, which runs the NCSU-APHIS Plant Pest Forecasting System (NAPPFAST).

This PIA is being conducted because users are required to submit their name, affiliation, address, phone numbers, and email when requesting access to ZedX web services, and enter a user name and password to log in when granted access.

Overview

The NAPPFAST system is licensed and operated by North Carolina State University, and hosted and owned by ZedX Inc.

NAPPFAST is an internet tool for plant pest modeling that uses biological models and georeferenced climatological weather data. Users range from administrators, researchers, agriculture extension, and end users, such as growers, in government, university, and industry. Users can select, process, view, and download information according to the access lever granted.

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?

The following information is collected on an Account Request Form built in the database and stored in the System for those granted access:

- Full Name
- Agency
- Job Title
- Address
- Phone
- Fax
- Email

Upon being granted access, a username and password will be authorized to log on to the site.
1.2 **What are the sources of the information in the system?**

The user information stored in the system is collected on an *Account Request Form* accessed from a link on the login page.

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

The user information is used for customer account management purposes.

1.4 **How is the information collected?**

Requestors click on the *Request Account* link on the login page to open the *Account Request Form*. Requestors complete the form, agree to the *Terms and Conditions* and the *Privacy Policy*, and submit the form.

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

The submitted form is reviewed by staff with consideration given to the user level requested, the responsibilities of the user, and the reason provided for requesting access. Users can edit their personal information, such as phone number changes, by using the *Edit User Info* link on the home page of the site.

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

The information collected is for account management purposes, and users assent to be contractually bound by the rules of the website by agreeing to the *Terms and Conditions* and the *Privacy Policy*.

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

The user information collected and stored in the system consists of name, address, agency, job title, phone/fax numbers, and email. It is used internally for account management purposes. Before the user is granted access, a user must agree the *Terms and Conditions* and the *Privacy Policy*. 
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.

The user information stored in the system is used for internal account management purposes only.

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

There is no analysis conducted on the user information collected and stored in the system.

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

The NAPPFAST System uses georeferenced climatological weather data for plant pest modeling.

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.

Strong passwords are required for system access and are encrypted. Administrative access to the system is restricted to authorized staff.

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?

The data will be maintained permanently until the system records retention schedule is approved by NARA.
3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

No. This action is pending.

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

The user information stored in the system is needed for account management purposes as long as the account is active. Strong passwords are required and encrypted. Administrative access to the System is restricted to authorized staff.

**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?

The user information is not shared.

4.2 How is the information transmitted or disclosed?

The user information is not transmitted or disclosed.

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.

The user information is not shared, transmitted, or disclosed.

**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?

The user information is not shared with anyone or any organization.
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.

The user information is not shared with anyone or any organization.

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

The user information is not shared with anyone or any organization.

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

The user information is not shared with anyone or any organization.

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

New users must agree to the Terms and Conditions agreement and the Privacy Statement that appear on the Request Account Form before an account can be requested.

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

The user information listed in Section 1.1 is required on the Request Account Form. The users must agree to the Terms and Conditions agreement and the Privacy Statement before being granted access. If a requestor declines to accept these statements, access will not be granted and no information will be kept.
6.3 **Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

The *Terms and Conditions* agreement and the *Privacy Statement* must be accepted as written to be granted access to the System.

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

Individuals requesting access to NAPPFAST services are presented links to the *Terms and Conditions* agreement and the *Privacy Statement*. The requestor must agree to these documents before being granted access. If the requestor declines, no access is granted and no personal information will be stored in the System.

**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?**

Any individual may obtain information about the information in the system that pertains to them. Requests for hard copies of the records should be in writing, and the request must contain the requesting individual's name, address, name of the system of records, timeframe for the records in questions, any other pertinent information to help identify the file, and a copy of his/her photo identification containing a current address for verification of identification. All inquiries should be addressed to the Freedom Of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232.

The requestor also enters their name, agency, job title, address, phone/fax numbers, and email into the *Request Account Form*. Users can go to the *Edit User Info* page to access their information.

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

Users can go to the *Edit User Info* page to access their personal information and make changes.

7.3 **How are individuals notified of the procedures for correcting their information?**
The Home page has a link with procedures in place to the Edit User Info page. Users can make changes to the personal information displayed.

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

PPQ follows the formal redress procedures implemented by the APHIS Freedom OF Information Act Office. All inquiries should be addressed to the Freedom Of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232.

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 associated with the redress available. The agency formal redress is followed and is covered by Federal law.

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?

Requestors must complete the Account Request Form to be considered for system access. Once approved, their username and password will be authorized to log on to the site for one year. After one year, the account must be renewed.

8.2 Will Department contractors have access to the system?

Contractors do not have access to the system.

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

The Privacy Statement, which users must agree to, provides users with information regarding system privacy.

USDA employees and contractors on the behalf of USDA also participates in the USDA Security Awareness Training program.
8.4 **Has Certification & Accreditation been completed for the system or systems supporting the program?**

No. The ZedX Inc. Bellefonte Datacenter in Bellefonte, PA, is operational and undergoing Certification and Accreditation (C&A) to demonstrate compliance with the Federal Information Processing Standard (FIPS) 199.

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

New users must complete an *Account Request Form* and submit it for approval. Users granted access must log in with a username and strong password. The password is encrypted. The *Terms and Conditions* and *Privacy Policy* detail the safeguarding of the personal information collected.

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?

User personal information is not shared. Passwords are encrypted. Personal information collected is only used for account management purposes.

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 NCSU/APHIS Plant Pest Forecast (NAPPFAST) System is an internet tool for plant pest modeling using georeferenced climatological weather data.

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?

Not applicable

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

Not applicable

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

Not applicable

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?

Not applicable

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

Not applicable

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

Not applicable
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?

Not applicable

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)?

Not applicable

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?

Not applicable

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.

Not applicable
Responsible Officials

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