



USDA Privacy Impact Assessment

Fiscal Year 2025

Privacy Division (PD)
Cybersecurity and Privacy Operations Center (CPOC)
U.S. Department of Agriculture

Revisions

Date	Version	Notes
09/06/2023	1.0	Documented created.
02/12/2025	1.1	Removed “Gender” and “Sexual Orientation” from Biographical Information in accordance with Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.”

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Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	GEO Geospatial Asset Support System (GEO-GASS)
Program Office	Geospatial Enterprise Operations Branch
Mission Area	Farm Production and Conservation – Business Center (FPAC-BC)
CSAM Number	2054
Date Submitted for Review	-

Mission Area System/Program Contacts

Role	Name	Phone Number
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Abstract

The GEO Geospatial Asset Support System (GEO-GASS) supports USDA's Geospatial Enterprise Operations Branch and is a client server-based system used to manage aerial imagery. The USDA relies on Geospatial Enterprise Operations Branch (GEO) role and responsibility in the Acquisition, Inspection, Distribution and Archiving of the imagery needs for USDA, other federal & state agencies and the general public through the management of the Production Operations Management System (POMS). GEO-GASS uses the information collected to provide geospatial information to customers. The PIA is being conducted because this system contains PII.

Overview

GEO-GASS is owned by the Geospatial Enterprise Operations Branch within USDA's FPAC-BC. The business purpose of the information technology (IT) system is to manage aerial imagery support for Farm Service Agency (FSA), Natural Resources and Conservation Service (NRCS), and Risk Management Agency (RMA) as well as other USDA agencies.

The system, which users include FSA, NRCS, RMA other USDA agencies as well as commercial and public requests, was created to provide support for customer orders, manage data flow, and imagery inspection results in tabular data, but also geographic imagery information as well. The imagery supports the National High-Altitude Program (NHAP), the National Aerial Photography Program (NAPP) and the current aerial program, NAIP (National Agriculture Imagery Program).

It is estimated that approximately 100 individuals' information is stored within GEO-GASS. Information collected in the system includes customer and employee contact information as well as aerial imagery results. GEO-GASS consists of one application - Consolidated Management System (CMS) that automates aerial photography and contract support tasks for GEO Branch. The legal authorities to operate the IT system is the Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397. The PIA will not require or result in changes to existing business processes or technology.

Section 1: Authorities and Other Requirements

These questions identify all statutory and regulatory authorities for operating the project, application, or system, including the authority for collection, which SORN applies, if an ATO has been completed, and if there is Paperwork Reduction Act coverage:

What legal authorities and/or agreements permit the collection of information by the project, application, or system?

The legal authority to operate the IT system is the Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397.

Has Authorization and Accreditation (A&A) been completed for the project, application, or system?

- Security Plan Status: Authorized
- Security Plan Status Date: September 26, 2023
- Authorization Status: Authorized to Operate
- Authorization Status Date: September 26, 2023
- Authorization Termination Date: September 26, 2026
- Risk Review Completion Date: January 22, 2025
- FIPS 199 Classification of the System: Moderate

Which System of Records Notices (SORNs) apply to the information?

The following SORNS cover GEO-GASS: [FSA-2](#) and [FAS-14](#)

Is the collection of information covered by the Paperwork Reduction Act?

No

Section 2: Information Characterization

These questions define the scope of the information requested and collected, as well as the reasons for its collection as part of the project, application, or system being developed:

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

Identifying Numbers:

- File or Case ID Number

Biographical Information

Name (Including Nicknames)

- Business Mailing Address (Sole Proprietor)

What are the sources of the information in the project, application, or system?

Sources of information for GEO-GASS come from USDA customers and employees.

How is the information collected?

Information is collected from USDA customers and employees.

Does the project, application, or system use information from commercial sources or publicly available data? If so, explain why it is used.

No

How will the information be checked for accuracy? How often will it be checked?

Data collected from the customer is required by policy to be reviewed for accuracy, relevancy, timeliness, and completeness upon initial entry into the system and then again when any required updates are made.

Does the project, application, or system use third-party websites?

No

What is the purpose of the use of third-party websites?

Not Applicable

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

Not Applicable

List the privacy risks and mitigations related to the characterization of the information.

Privacy Risk: Misclassification of Data: Incorrectly categorizing PII which can lead to inadequate protection measures, exposing sensitive data to unauthorized access or misuse.

Mitigation: The information is only disclosed to those responsible for the administration of the program or other entities that have legal authority to access the information. Users are

required to authenticate their identity prior to accessing the information and access is restricted based upon user role. In addition, many NIST privacy controls have been designed and implemented for the system. These controls are monitored and tested for operational effectiveness in accordance with USDA's Risk Management Framework (RMF).

Section 3: Information Uses

These questions delineate the use of information and the accuracy of the data being used.

Describe why and how the information collected, used, disseminated and/or maintained will support the project, application, or system's business purpose.

The information is collected from customers and employees to provide support for customer orders, manage data flow, and imagery inspection results in tabular data, but also geographic imagery information as well. This information is used to support the FSA, NRCS, and RMA as well as other USDA agencies and the NHAP, the NAPP and the current aerial program, NAIP.

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

No additional technology or tools (other than the application and database itself) are used to analyze the data.

List the privacy risks and mitigations related to uses of the information.

Privacy Risk: Unauthorized Use of Data: PII may be used for purposes other than those for which it was collected, violating privacy principles and user expectations.

Mitigation: Purpose Limitation: Clearly define and communicate the specific purposes for which PII is collected and used, ensuring that it is not used for unrelated purposes without consent.

Section 4: Notice

These questions are intended to provide notice to the individual of the scope of information collected, the right to consent to use of the information, and the right to decline to provide information.

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

Privacy Act Statements are placed on each form that collects PII. The statement notifies the individual of the authority to collect the information, what organizations may be legally authorized to receive it, how the information may be used, and individual's option to refuse to provide the information to USDA.

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

Individuals may decline to provide any of the information without penalty. However, refusing to provide some information could delay processing or result in the denial of their application. Users have the right to provide consent to access their information. To do so, the individual must make a written request to the information owner, system owner, or Privacy Officer to evaluate their request.

List the privacy risks and mitigations related to notice.

Privacy Risk: Inadequate Disclosure: Notices may fail to adequately inform individuals about how their personal information will be collected, used, and shared, leading to misunderstandings about privacy practices.

Mitigation: Clear Communication: Ensure that privacy act statements are written in clear, accessible language. Avoid legal jargon to make it understandable for all users.

Section 5: Data Retention

These questions outline how long information will be retained after the initial collection.

What information is retained and for how long?

All records found in GEO-GASS are retained for 10 years and deleted only after the information is no longer needed for administrative, legal, audit or other operational purposes.

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

The retention schedule has been approved by the USDA records office and NARA. The Records Schedule Number is DAA-0145-2015-0019.

List the privacy risks and mitigations related to data retention.

Privacy Risk: Excessive Data Retention: Retaining PII longer than necessary can violate data minimization principles, increasing the risk of unauthorized access and exposure.

Mitigation: Data Retention Policy: Use NARA data retention policies that outline how long different types of PII will be retained and the rationale for those timeframes.

Section 6: Information Sharing

These questions define the content, scope, and authority for information sharing.

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

Information is shared to support the FSA, NRCS, and RMA as well as other USDA agencies.

List the privacy risks and mitigations related to internal information sharing and disclosure.

Privacy Risk: Unauthorized access to sensitive data could pose a risk to existing data and disclosure to unauthorized parties.

Mitigation: Information is electronic transmission of the data is encrypted, and access is only granted based on a user's role and active/inactive status.

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

Information is shared with U.S. Geological Survey (USGS) NHAP, NAPP, and NAIP to support customer orders, manage data flow, and imagery inspection results in tabular data, but also geographic imagery information as well.

List the privacy risks and mitigations related to external information sharing and disclosure.

Privacy Risk: Unauthorized Access: Sharing PII with third parties increases the risk of unauthorized access, especially if those parties do not have adequate security measures in place.

Mitigation: Due Diligence: Conduct thorough due diligence on third parties before sharing personal data, ensuring their privacy standards and practices are comparable to the PA and USDA requirements.

Section 7: Redress

These questions address the individual's ability to ensure the accuracy of the information collected about him or her.

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

Should an individual wish to gain access to their information, they will need to make a written request to the system owner or FPAC FOIA Officer; to authenticate their identity and identity the records they request access to GEO-GASS.

What are the procedures for correcting inaccurate or erroneous information?

Individuals must make a written request to the system owner, information system owner or Privacy Officer, authenticate their identity, identify the portion(s) of the record that needs to be corrected and describe whether their information is inaccurate or erroneous. Upon receipt and review of the request, if it is verified a correction needs to be made, the record will be corrected and a sample of the document with the correction will be transmitted to the individual who made the request.

Requests to correct a record should be sent directly to a local or state FSA Office. All requests (1) must be in writing, (2) clearly identify the information that needs correction, (3) provide a reason why the information is incorrect, and (4) state what the correction should be.

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

In addition to normal notification through the SORN process, field technicians provide correction procedures to individuals upon request.

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

Individuals may contact their administrative point of contact to obtain access to their information.

List the privacy risks and mitigations related to redress.

Privacy Risk: The system information provided by participants is important to be accurate, as it has an impact on their program participation. Incorrect information may adversely affect the participant or other individuals, resulting in denial of service or incorrect payments.

Mitigation: Individuals are provided with access to their information electronically to check for accuracy of their submission(s). Additionally, program staff will verify submitted information with the individual as well as previously collected data.

Section 8: Auditing and Accountability

These questions describe technical safeguards and security measures:

How is the information in the system/project/program secured?

GEO-GASS employs a defense-in depth strategy. Web applications are protected by web application firewall and restrictive networking. The application server is configured using Center for Internet Security hardened images and all components employ end point protection and real-time monitoring for malicious activity. Access to the system is role-based and requires multi-factor authentication for all accounts. All data transfer and storage utilize Federal Information Processing Standard (FIPS 140-2) compliant encryption.

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

Access to PII is determined by user role and restricted access. Access to PII is granted by appropriate legal authorities. Applicable user and roles are documented in the System Security Plan.

How does the program review and approve information sharing requirements?

Any time organizations outside of USDA requests access to information, a data sharing agreement is created and routed through the Grants and Agreements Office for review. The Grants and Agreements Office ensure all stakeholders, to include, but not limited to the FPAC Privacy Officer, a Senior Agency Official, and receiving organization official, review and sign the data sharing agreement that lays forth the standards and rules for handling USDA PII.

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

Annual organizational training, including USDA Information Security Awareness Training & Acknowledgment of Rules of Behavior, is mandatory for all federal and contractor staff working with GEO-GASS.