



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	PEGA_NITC
Program Office	Information Solutions Division
Mission Area	Farm Production and Conservation (FPAC)/Natural Resources Conservation Service (NRCS)
CSAM Number	2041
Date Submitted for Review	-

Mission Area System/Program Contacts

Role	Name	Phone Number
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Abstract

The PEGA_NITC platform supports the USDA NRCS [Environmental Quality Incentives Program](#) with NRCS Registry. PEGA_NITC uses the information collected to assist customers and businesses to solve complex business problems using PEGA's automation, and to streamline all the processes into a single platform. The PIA is being conducted because this system contains PII.

Overview

For the FY 2025 PIA, the PEGA_NITC platform was modified with the addition on one application - NRCS Registry. The focus of this PIA review is solely on the data maintained and modified with the NRCS Registry application. PEGA_NITC is owned by the Information Solutions Division within USDA's NRCS. The business purpose of the information technology (IT) system is to assist customers and businesses to solve complex business problems using PEGA's automation, and to streamline all the processes into a single platform. This relates to NRCS' mission to deliver conservation solutions so agricultural producers can protect natural resources and feed a growing world.

The NRCS Registry is a Digital Platform specifically designed for control, management, and ongoing operations of external Technical Service Provider (TSP) resources, the organization, and activities within NRCS in addition to providing businesses or landowners interested in obtaining qualified, certified technical resources to improve their operations or asset value through the application of conservation practices

The users of the system include general public, NRCS staff, TSPs, and their representatives. It is estimated that approximately 200 NRCS staff and 10,000 TSPs and their representatives use the system. TSP information in the system is about technical service providers and the technical services (implementation of conservation practices) they are certified to provide so that producers and landowners can search for them and use their services for technical assistance. The TSP contact information is made available to the public website.

PEGA_NITC is currently comprised of multiple applications, which now includes the NRCS Registry. The application stores Technical Service Provider's (TSP) qualifications and contact information, which contains personable identifiable information (PII). This information is required by the public to search for qualified TSPs to provide one-on-one conservation consulting and services for their land or business.

The legal authorities to operate the IT system include the following:

- Soil Conservation and Domestic Allotment Act** (16 USC 590a et seq.)
- Food Security Act of 1985** (Public Law 99-198)
- Conservation Title of the Farm Bill** (various sections across different farm bills).
- Environmental Quality Incentives Program (EQIP)**: Established under the **Farm Security and Rural Investment Act of 2002** (Public Law 107-171).
- Conservation Reserve Program (CRP)**: Authorized under the **Food Security Act of 1985** and subsequent farm bills.

- Conservation Stewardship Program (CSP)**: Established under the **Food, Conservation, and Energy Act of 2008** (Public Law 110-246).

The completion of this PIA will not result in changes to business processes or technological changes.

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 authorities permit the collection of information by PEGA_NITC include the following:

- Soil Conservation and Domestic Allotment Act** (16 USC 590a et seq.)
- Food Security Act of 1985** (Public Law 99-198)
- Conservation Title of the Farm Bill** (various sections across different farm bills).
- Environmental Quality Incentives Program (EQIP)**: Established under the **Farm Security and Rural Investment Act of 2002** (Public Law 107-171).
- Conservation Reserve Program (CRP)**: Authorized under the **Food Security Act of 1985** and subsequent farm bills.
- Conservation Stewardship Program (CSP)**: Established under the **Food, Conservation, and Energy Act of 2008** (Public Law 110-246).

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

- Security Plan Status: Completed
- Security Plan Status Date: August 30, 2024
- Authorization Status: Authorized to Operate
- Authorization Status Date: June 23, 2023
- Authorization Termination Date: June 23, 2026
- Risk Review Completion Date: May 23, 2024
- FIPS 199 Classification of the System: Moderate

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

The following SORN covers PEGA_NITC: [NRCS-1 SORN in Federal Register Vol. 70, No. 167](#).

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

PEGA_NITC information collection is covered by the Paperwork Reduction Act. Form FSA-211 is subject to this Act. Additionally, the Power of Attorney Worksheet includes OMB control number 0560-0190 supports this collection.

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:

- Professional License Number
- Personal Mobile Phone Number
- Business Mobile Phone Number (Sole Proprietor)

Biographical Information:

- Name (Including Nicknames)
- Business Mailing Address (Sole Proprietor)
- Business Phone or Fax Number (Sole Proprietor)
- Group or Organization Membership
- Home Phone or Fax Number
- ZIP Code
- Personal Email Address
- Business Email Address
- Employment Information
- Education Information

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

The information is supplied directly from TSPs or their representatives or 3rd party certifying organization.

How is the information collected?

Information is collected from TSPs or NRCS staff entering information on behalf of TSPs or 3rd party TSPs using the NRCS registry application form.

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

No. The system does not get information from commercial or public sources. The data collected from the TSP becomes publicly available.

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

The TSP certification has a review and approval process for checking for accuracy. Certification is valid for 3 years after which the TSP must be recertified.

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

No

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

N/A

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.

Inadequate Security Controls: If PII is not properly identified and characterized, it may not receive the necessary security measures, increasing the risk of data breaches.

Mitigation: Data Classification Policy: Adhere to departments data classification policy that categorizes PII based on sensitivity and the potential impact of unauthorized access or disclosure.

Regular Data Inventory: Conduct regular inventories of personal information to identify and categorize the types of data collected, stored, and processed by the organization.

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 collected is used to assist customers and businesses solve complex business problems using PEGA's automation, and to streamline all the processes into a single platform. TSP information provides businesses or landowners interested in obtaining qualified, certified technical service providers to improve their operations or asset value through the application of conservation practices.

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

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.

Data Misuse: Employees or third parties may misuse PII, either intentionally or unintentionally, leading to breaches of confidentiality and trust.

Mitigation: Access to the information is limited to appropriate NRCS personnel and partners using 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. The contact information of the TSP is validated and approved in the NRCS Registry system before it is made public.

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: The information collected in accordance with USDA NRCS-1 is a part of a Privacy Act System of Records that requires safeguarding access and disclosure when legal authority exists. The system information is specific to each individual and could cause moderate harm to individuals upon unauthorized disclosure. As a result of the information being connected to USDA NRCS-1, information in the system can be only accessed or disclosed upon legal authority or dictated routine use.

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 PEGA_NITC 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 [NI-114-08-3](#).

List the privacy risks and mitigations related to data retention. Follow this format:

Privacy Risk: 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.

Mitigation: Access and destruction of the information will only occur upon establishment of proper legal authority to access the data, pursuant the Privacy Act, Section 1619 of the Farm Bill, and the appropriate SORN(s) covering the information.

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?

Contact information and certification results of TSP is publicly available information for searching and viewing. NRCS staff and TSPs use them internally. TSP information is transmitted to AgLearn via ICAM.

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?

None

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

Privacy Risk: N/A

Mitigation: N/A

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 identify the records they request access to PEGA_NITC.

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?

PEGA_NITC employs a defense-in-depth strategy. The web application is 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 ensures 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 PEGA_NITC.