



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	ZRoles
Program Office	Mission Delivery Optimization
Mission Area	Natural Resources Conservation Service (NRCS)
CSAM Number	1952
Date Submitted for Review	-

Mission Area System/Program Contacts

Role	Name	Phone Number
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System/Program Managers	Douglas Cartwright	000-000-0000

Abstract

ZRoles supports various USDA's NRCS programs, including [Environmental Quality Incentives](#), [Conservation Stewardship Program](#), [Agricultural Conservation Easement](#), and Conservation Technical Assistance. The four programs help farmers, ranchers, and forest landowners integrate conservation into working land, assist with building existing conservation efforts while strengthening operations, help landowners, land trust, and other entities protect, restore, and enhance wetlands, and protect working farms and ranches through conservation easements. This system uses the information collected to provide a streamlined, single source for the assigning of application roles and scope to NRCS agency employees, affiliates, and technical service providers to access NRCS applications. The PIA is being conducted because this system contains PII.

Overview

ZRoles is owned by Mission Delivery Optimization within NRCS. The business purpose of the information technology (IT) system is to provide the ability for user role and scope assignments by application. This relates to NRCS's mission to deliver conservation solutions so agricultural producers can protect natural resources and feed a growing world. The system, which users include NRCS agency employees, affiliates, and technical service providers, was created to provide a streamlined, single source for the assigning of application roles and scope. The programs give active/inactive status of the users of the system. It is estimated that there are approximately 75,000 users within zRoles. The information collected is basic business contact information to determine user status. ZRoles is a system with no additional applications.

The legal authorities operating the IT system include the following:

Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397, the Agricultural Act of 2014 (Pub. L. 113-79), the Agricultural Improvement Act of 2018 (Pub. L. 115-334), and the Coronavirus Aid, Relief, and Economic Security Act (CARES ACT) (Pub. L. 116- 136)

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 following legal authorities pertain to zRoles: Commodity Credit Corporation Charter Act (15 U.S.C. 714 et seq.) and Executive Order 9397, the Agricultural Improvement Act of 2018 (Pub. L. 115-334) and 16 U.S.C. 590 a–f, q, q–1.

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

- Security Plan Status: Completed
- Security Plan Status Date: January 31, 2025
- Authorization Status: Authorized to Operate
- Authorization Status Date: January 31, 2025
- Authorization Termination Date: January 31, 2028
- Risk Review Completion Date: February 5, 2025
- FIPS 199 Classification of the System: Moderate

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

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

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:

- Employee Identification Number

Biographical Information:

- Name (Including Nicknames)
- Home Phone or Fax Number
- Home Address
- ZIP Code
- Nationality
- Personal Email Address
- Business Email Address
- Employment Information

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

The information is supplied directly from program participants and authorized external entities such as cooperative marketing associations, loan service agents, electronic warehouse receipt providers, and peanut shellers. Information is also obtained from internal FSA databases such as the service center information management system.

How is the information collected?

Information is collected from the program participants of the programs.

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?

Program staff and participants check information upon data entry. Additionally, program staff review participant information when 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?

N/A

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

N/A

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

Privacy Risk: Privacy Act (PA) risks associated with the characterization of information may include:

- **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.
- **Over-collection of Data:** Misunderstanding classification of information may result in collecting more data than necessary, violating principles of data minimization and increasing exposure to risk.

Mitigation: By implementing some or all the following mitigation actions, mission areas can effectively characterize personal identifiable information (PII), manage privacy risks, and comply with the PA requirements:

- **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.
- **Contextual Information Use:** Ensure that the context in which personal information is collected and used is considered when characterizing data, recognizing how this affects privacy risks.

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 support the Commodity Loan and Loan Deficiency Payment programs. Specifically, the information is used to determine eligibility, process applicant information, disburse loans, make payments, service transactions, and generate reports.

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: Privacy act risks associated with the uses of information include:

- **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.
- **Inadequate Consent:** If individuals are not adequately informed about how their data will be used, or if consent is not appropriately obtained, it can result in legal non-compliance and ethical concerns.

Mitigation: By implementing some or all the following mitigation actions, mission areas may safeguard PII better and ensure responsible use in compliance with PA requirement:

- **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.
- **Data Minimization:** Collect and use only the minimum amount of PII necessary to achieve the intended purpose, reducing the risk of misuse.
- **User Consent:** Obtain explicit consent from individuals before using their personal information, particularly for purposes that go beyond the original intent of collection.

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: 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.

Mitigation: 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 ZRoles 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 in the [Request for Records Disposition Authority Form](#) is NI-114-083.

List the privacy risks and mitigations related to data retention.

Privacy Risk: The information contained in the records is sensitive, which could cause a privacy breach if not properly safeguarded.

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?

- System Name: EmpowHR
 - Information: Federal employee active/inactive status
 - Purpose: Access determination
 - Transmitted: Electronic
- System Name: Affiliates
 - Information: Non-federal employee active/inactive status
 - Purpose: Access determination
 - Transmitted: Electronic
- System Name: SCIMS
 - Information: Landowner demographic data
 - Purpose: Access
 - Transmitted: Electronic

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 not shared or disclosed with organizations that are external to the USDA.

List the privacy risks and mitigations related to external information sharing and disclosure. Follow this format:

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 identity the records they request access to ZRoles.

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?

ZRoles is surrounded by a web application firewall that protects against web-based threats by monitoring, filtering, and blocking data packets. The application is also hardened by Virtual Machine Image hosting provided by the Center for Internet Security. 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 ZRoles.