



USDA Privacy Impact Assessment

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

Revisions

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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.”

Table of Contents

Privacy Impact Assessment for the USDA IT System/Project	3
Mission Area System/Program Contacts	3
Abstract	4
Overview.....	4
Section 1: Authorities and Other Requirements	5
Section 2: Characterization of the Information	6
Section 3: Uses of the Information.....	8
Section 4: Notice	9
Section 5: Data Retention	10
Section 6: Information Sharing.....	11
Section 7: Redress.....	12
Section 8: Auditing and Accountability	13

Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	NRE FS Casepoint (NRE FS Case)
Program Office	Chief Information Office (CIO)
Mission Area	USDA Forest Service
CSAM Number	2534
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Mission Area System/Program Contacts

Role	Name	Phone Number
MA Privacy Officer	Benjamin Moreau	202-380-6165
Information System Security Manager	Kristopher Harig	208-954-2910
System/Program Managers	Benjamin Moreau	202-380-6165

Abstract

This is a PIA for the Natural Resource and Environment (NRE) Forest Service (FS) Casepoint (NRE FS Case) system. NRE FS Case consists of a cloud-based data discovery platform that provides a general data repository that allows the FS Litigation / Law Enforcement Analysis and Forensics (LLEAF) branch and its customers to temporarily store and collaborate on information involving criminal, administrative, Freedom of Information Act (FOIA), and civil cases from an organized, managed, and secure environment. The information is processed, reviewed, analyzed, and culled within the system to produce a final product meeting the customers' needs related to their case/matter. NRE FS Case requires Personally Identifiable Information (PII), and information uploaded to the system to support a customer's case/matter may contain PII.

Overview

NRE FS Case is owned by the FS, an agency under the United States Department of Agriculture (USDA). NRE FS Case uses a Federal Risk and Authorization Management Program (FedRAMP) authorized Software as a Service (SaaS) offering that provides the FS LLEAF branch and the customers they serve with a capability that facilitates the processing (review, analysis, and culling) of information related to criminal, administrative, FOIA, and civil cases to produce a final product meeting the customers' needs related to their case/matter. Customers of the system include the USDA Office of the General Counsel (OGC), FS FOIA representatives, FS Law Enforcement, and Human Resources personnel.

The active user population of the system has historically remained under 40 users and moving forward this number will vary depending on customer case/matter requirements. PII is required and is used for the establishment of the user accounts within the system. Due to the nature of the system and what it is used for, customer information with origins in other systems/devices/etc., that is uploaded to the system, may contain PII. Information uploaded to the system is customer specific and would be directly related to cases/matters that they would be supporting. The information is typically uploaded from another information system used by the LLEAF branch that also supports the organization's eDiscovery process. Information sharing within the system consists of the collaboration taking place between authorized users within the system at the case/matter-level. Information is not shared externally.

Section 1: Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what 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 or system?

NRE FS Case does not collect the information. Information would come from other sources that could include system of records. For example a data set present within the system within a case could contain emails that would have been collected (gathered) from any number of sources local devices, the Department (eComply) or systems (Office 365) identified by the investigative authority (HRM, LEI, OGC, FOIA) specific to their case/matter.

The only PII collected consists of information used for the establishment of user accounts. Public Laws 99-474 (Computer Fraud and Abuse Act of 1986) and 93-579 (Privacy Act of 1974) permit the collection of this information.

The legal authorities and/or agreements associated with the customer information temporarily stored within the system include the following:

Freedom of Information Act (1966) - Provides the public the right to request access to records from any federal agency, influencing OGC's responsibilities in handling legal aspects of information requests.

Federal Rules of Civil Procedure; Chapter 5, Depositions and Discovery, Rule 26(a) - General provisions governing discovery.

Has Authorization and Accreditation (A&A) been completed for the system?

Yes, the System Security Plan (SSP) for the system was approved 8/1/2024. The system has a current approved Authorization to Operate (ATO) and was last authorized 11/15/2023. The current ATO expires 11/15/2026. The system undergoes a risk assessment annually and the current risk assessment was completed 7/11/2025. The system has a Federal Information Processing Standards (FIPS) 199 security categorization of Moderate.

What System of Records Notice(s) (SORN(s)) apply to the information?

None, NRE FS Case is a temporary repository of data and is not a system of records. Information stored in the system is not indexed and retrieved by a unique personal identifier.

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

No, NRE FS Case does not collect information from the public.

Section 2: Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.

What information is collected, used, disseminated, or maintained in the system/program?

Biographical Information

- Name (Including Nicknames)
- Business Phone or Fax Number (sole proprietor)
- Business Email Address
- Employment Information

What are the sources of the information in the system/program?

User account information contains PII and is made up of information that is collected from users as part of the access request process and USDA Identity, Credential, and Access Management (ICAM) information that is gathered by NRE FS Case account managers. Users of the system consist of (USDA Personnel), which includes personnel from the USDA OGC, FS Law Enforcement, FS Human Resources, and FS FOIA representatives.

Customer information, which may contain PII, is not collected by NRE FS Case. Customer information is gathered outside the system as part of the organization's eDiscovery process and is uploaded to customer specific cases/matters within the system. This information is typically uploaded from another FS system that supports the organization's eDiscovery process that is used by the LLEAF branch.

How is the information collected?

NRE FS Case collects the information needed for the establishment of user accounts using system access request forms. This is a CASE system form. This is the only information that the system collects. Any information contained within customer information within the system related to a case/matter would have been previously collected within the system of origin.

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

No, NRE FS Case does not use information from commercial sources or publicly available data.

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

NRE FS Case will check the accuracy of the user provided information within the system access request forms it receives. Any accuracy checks related to incidental information contained within customer information that is uploaded to the system to be processed would be the responsibility of the system of origin.

Does the system/program use third-party websites?

No

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

Not applicable – NRE FS Case does not use third-party websites.

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

Not applicable – NRE FS Case does not use third-party websites.

Privacy Impact Analysis: Related to characterization of the information.

Privacy Risk: Unauthorized disclosure or modification of information.

Mitigation: The system only collects the information required for the establishment of user accounts. There are multiple controls in place to protect the information stored within the system. Multifactor authentication is in place for system access. Information is protected while in transit and while at rest and role-based access control limits access to authorized users to only the information they have been authorized to access at the appropriate level.

Section 3: Uses of the Information

The following questions are intended to clearly 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 program's business purpose?

The information collected from users on system access request forms is used to establish user accounts within the system. To utilize the capabilities of the system, users must provide the information necessary to establish user accounts to access the system.

Customer Information temporarily stored in NRE FS Case is used to create a final product for the customer that enables them to satisfy their needs as it pertains to deliverables required for litigations, investigations, and FOIA requests. Customers and their collaborators will use the system to process, review, analyze, and cull their case/matter related information based on their requirements related to the case/matter.

Does the system/project/program 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.

Privacy Impact Analysis: Related to uses of the information.

Privacy Risk: Unauthorized disclosure or modification of information.

Mitigation: The system utilizes a FedRAMP authorized SaaS offering and account/access management controls and established procedures used by system account managers are in place to ensure that only those authorized for access are granted the appropriate level of access to the appropriate case/matter they are associated with within the system using role-based access control. System account managers are required to take role-based security training, and all users are required to take information security awareness training and are subject to USDA's rules of behavior for information technology and information systems. Information within the system is protected in transit and while at rest.

Section 4: Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information.

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

Notice is provided to individuals within the system access request form. There isn't an official FS form number for the form.

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

Providing information within the access request form is voluntary, however, the information is required for the establishment of a user account. An account will not be established, and access will not be granted without the required information.

Privacy Impact Analysis: Related to notice.

Privacy Risk: Insufficient notice about the use of information.

Mitigation: NRE FS Case is not a system of records, however, individuals requesting access are notified within the access request form that the information provided is required for the processing of the requested user account.

Section 5: Data Retention

The following questions are intended to outline how long information will be retained after the initial collection.

What information is retained and for how long?

System user account information is stored indefinitely in order to preserve an audit trail within the system.

Customer information uploaded to the system is stored temporarily at the case/matter-level until the information is processed and a final product meeting the customer's needs is produced. Once the final product is produced and exported from the system and the information is no longer needed within the system as determined by the customer, all information related to the customer's case/matter is removed from the system.

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

General Records Schedule (GRS) 4.2: Information Access and Protection Records applies to customer information processed within the system related to FOIA requests.

Regarding customer information consisting of ESI associated with a litigation hold, per Departmental policy, litigation holds for ESI override any records retention schedule or other agency policy that may call for the transfer, disposal, or destruction of the information until the hold has been removed by the authorized entity that ordered the hold.

Privacy Impact Analysis: Related to retention of information.

Privacy Risk: Retaining information longer than necessary.

Mitigation: NRE FS Case is used to temporarily store customer uploaded data until a final product is produced. Once the final product is produced, exported from the system, and the customer no longer needs the information within the system, the information is to be removed.

Section 6: Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

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

Internal organizational sharing consists of customers and collaborators accessing information within the system. Customers consist of personnel from the USDA OGC, FS Law Enforcement, FS Human Resources, and FS FOIA representatives. The customers will use the system to produce a final product meeting their needs, specific to their case/matter. These customers will identify other USDA personnel who they would need to collaborate with to produce their final product. Those collaborators, identified by the customers, would be assigned to cases/matters by NRE FS Case account managers and will only have access to the information within the cases/matters they are assigned to. This is the only form of internal organizational sharing, and this sharing occurs within the system through direct access, there is no sharing of information with other systems where information is transmitted or received by the system

Privacy Impact Analysis: Related to internal sharing and disclosure.

Privacy Risk: Unauthorized disclosure or modification of information.

Mitigation: Account/Access management controls and established procedures used by system account managers are in place to ensure that only those authorized for access are granted appropriate access to the case/matter they are associated with within the system.

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

None, NRE FS Case does not directly share any information with any external organizations. NRE FS Case is used to produce a final product based on the customers' needs related to their case/matter. Any distribution of a customer's final product produced within the system is the responsibility of the customer and would occur after the final product is exported from the system by the customer.

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk: Unauthorized disclosure of information.

Mitigation: NRE FS Case does not share information externally. Any sharing of information related to a customer's final product would occur outside of the system. System account managers are required to take role-based security training. All users are required to take information security awareness training and are subject to USDA's rules of behavior for information technology and information systems.

Section 7: Redress

The following questions are directed at an 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?

Not applicable - There are no procedures or use cases that apply to allowing individuals to gain access to their information within the system. NRE FS Case is not a system of records. Any procedures to allow access to information included in customer uploaded information stored within NRE FS Case would be done in the system of origin.

What are the procedures for correcting inaccurate or erroneous information?

Not applicable - There are no procedures or use cases that apply to the correction of inaccurate or erroneous information. NRE FS Case is not a system of records. Any correction to information included in customer uploaded information stored within NRE FS Case would be done in the system of origin.

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

Not applicable - There are no procedures or use cases that apply to the correction of inaccurate or erroneous information. NRE FS Case is not a system of records. Any correction to information included in customer uploaded information stored within NRE FS Case would be done in the system of origin.

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

Not applicable - NRE FS Case is not a system of records. Any redress available to individuals pertaining to information included in customer uploaded information stored within NRE FS Case would only be applicable to and take place within the system of origin.

Privacy Impact Analysis: Related to redress.

Privacy Risk: Lack of Transparency: Not providing clear information about how redress mechanisms work can create confusion and mistrust among individuals regarding their rights and the agency's accountability.

Mitigation: Any redress available to individuals pertaining to information included in customer uploaded information stored within NRE FS Case would only be applicable to and take place within the system of origin.

Section 8: Auditing and Accountability

The following questions are intended to describe technical safeguards and security measures.

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

The system utilizes a FedRAMP authorized SaaS offering. The information is protected through controls implemented by the cloud service provider combined with the controls implemented by the system. This includes multifactor authentication, auditing measures, backups to protect against data loss, encryption of information while in transit and at rest, incident response, and role-based access control implemented down to the case/matter level.

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

Account/Access management controls and established documented procedures used by system account managers are in place to ensure that only those authorized for access are granted access and that the appropriate level of access is granted. Users are only granted access to the case/matter they are associated with within the system. All access must be requested and approved by system account managers. Users are uniquely identified and authenticated, and multifactor authentication is utilized.

How does the program review and approve information sharing requirements?

NRE FS Case does not share information. Customers utilizing the system will identify other USDA personnel who they would need to collaborate with to produce a final product meeting their needs specific to their case/matter. Those collaborators would be assigned to the cases/matters and only have access to the information within the cases/matters they are assigned to. This is the only form of sharing that would occur within the system. Any sharing of information related to a customer's final product would occur outside of the system by the customer.

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

All users are required to take information security awareness training and are subject to USDA's rules of behavior for information technology and information systems.