



Office of the Chief Information Officer
U.S. DEPARTMENT OF AGRICULTURE

USDA Privacy Impact Assessment

Fiscal Year 2025

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.”

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Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	ERS Azure
Program Office	ERS
Mission Area	REE
CSAM Number	2312
Date Submitted for Review	9/22/25

Mission Area System/Program Contacts

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Abstract

ERS data systems that include PII are used in ERS' mission to anticipate trends and emerging issues in agriculture, food, the environment, and rural America; to conduct high-quality, objective economic research to inform and enhance public and private decision making; and to create data products for research purposes.

Overview

This assessment applies to the ERS Azure data system. The ERS Azure system is the collection of production applications used by the agency. These applications build and deliver the research created in support of the agency mission. This document 1) applies to the ERS LAN drives and data systems within the ERS environment including those used by these applications to produce the agency research 2) does not include physical enclaves, virtual enclaves, or data centers that require log in external to the ERS environment (e.g. Administrative Data Research Facility, any NASS enclave, any Census enclave, Federal Statistical Research Data Centers, or any similar future enclave.)

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?

The ERS research mission is founded by 7 U.S.C. 1621 – 1627. ERS data is used to produce estimates of net farm income by type of commercial producer as required in 7 U.S.C. 7998 and estimates of enterprise production costs as required in 7 U.S.C. 1441(a). This Data also supports the development of the Prices Paid Index, a component of the Parity Index referred to in the Agricultural Adjustment Act of 1938 and as amended by the Agricultural Acts of 1948, 1949, 1954, and 1956. Congress has mandated nationally coordinated databases on agricultural chemical use and related farm practices under Title 7 USC 136i-2. Delegations of authority to Secretary of Agriculture and Administrator of Economic Research Service, 7 U.S.C. 2204(a) and 7 CFR 2.67, allow ERS to collect statistics and information and conduct research.

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

Yes, approved 4/24/2025.

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

- [GOVT-1 SORN](#)
- An ARS SORN is currently in progress.

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

N/A

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? PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.

Biographical Information:

- Name (including nicknames)
- Ethnicity
- Citizenship
- Home address
- Spouse information
- Race
- Business mailing address (sole proprietor)
- Business phone or fax number (sole proprietor)
- ZIP code
- Children information
- Date of birth (MM/DD/YY)
- Country of birth
- Global Position System (GPS)/Location data

Characteristics:

- Height
- Weight

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

The sources of the data are other federal and local governmental agencies and third-party vendors.

How is the information collected?

ERS collects some administrative data through interagency agreements or contracts. Some datasets are CIPSEA-protected data collections which are collected by either other federal agencies or contractors. Some datasets are purchased from third-party vendors.

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

ERS purchases data from third-party vendors. ERS makes these purchases because they are important inputs to ERS research and ERS does not have the means to collect them. In some cases, the sources of data are publicly available, but the breadth and volume of data needed prevents ERS from directly collecting the data.

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

Directly collected data is reviewed and validated by the agency collecting the data. Proprietary and administrative data are validated by source/provider. Data is also validated by ERS subject matter experts upon receipt and during processing/loading.

Does the system/program 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 though the use of third-party websites?

N/A

Privacy Impact Analysis: Related to 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: Uses of 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 mission of Economic Research Service is to anticipate trends and emerging issues in agriculture, food, the environment, and rural America and to conduct high-quality, objective economic research to inform and enhance public and private decision making. Having the necessary data is critical for ERS to perform its research missions. The data ERS uses is a critical input for agency research. Data is aggregated to a level that prevents identification of individuals/businesses. The information is incorporated into research products and publications.

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.

Most of the data used by ERS are aggregated to higher levels for use in ERS research. ERS analysis does reveal patterns but at aggregated levels such as statewide or age groups. ERS does not query individual or business names.

Privacy Impact Analysis: Related to uses of information.

Privacy Risk

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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 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?

For the most part, ERS does not directly collect information about individuals. In the case of the few economic surveys that ERS sponsors (but do not collect), survey respondents are sent notification of the upcoming survey. Per the CIPSEA law, they are also provided a confidentiality statement that states that the information they provide will be aggregated with other responses and only used for statistical purposes.

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

In the case of the few economic surveys that ERS sponsors, those surveys are voluntary, and respondents can opt out of providing any information. Most of the confidentiality statements contain the following:

The information you provide will be used for statistical purposes only. Your response will be kept confidential and any person who willfully discloses ANY identifiable information about you or your operation is subject to a jail term, a fine, or both. This survey is conducted in accordance with the Confidential Information Protection and Statistical Efficiency Act of 2018, Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35 and other applicable Federal laws. For more information on how we protect your information please visit: [agency survey webpage].

Privacy Impact Analysis: 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.
- **Ambiguity:** If notices are unclear or overly complex, individuals may not fully understand their rights or the mission area's data practices, leading to a lack of informed consent.

Mitigation

- **Clear Communication:** Ensure that privacy notices are written in clear, accessible language. Avoid legal jargon to make it understandable for all users.
- **Regular Updates:** Review and update privacy notices regularly to reflect changes in data practices, regulations, or business operations.

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?

ERS adheres to the NARA rules and directives for those records that fall under NARA regulations. ERS retains copies of datasets for research purposes indefinitely.

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.

Yes, RG-0354, Economic Research Service, N1-354-09-001

Privacy Impact Analysis: Related to retention of information.

Privacy Risk

- **Excessive Data Retention:** Retaining PII longer than necessary can violate data minimization principles, increasing the risk of unauthorized access and exposure.
- **Data Breaches:** The longer PII is retained, the greater the risk of data breaches occurring, whether through hacking, accidental disclosures, or insider threats

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

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?

ERS allows controlled access to data for vetted researchers within the agency. ERS also shares, receives, or transmits data with the following USDA agencies: NASS, FSA, APHIS, RMA, AMS, FNS, FSIS. In most cases ERS receives data for use in agency research. Occasionally ERS will transmit aggregated data for other agencies to use in their work. Data are transmitted using approved secure data transfer methods such as Kiteworks.

Privacy Impact Analysis: Related to internal sharing and disclosure.

Privacy Risk

- **Unauthorized Access:** Employees may access PII without proper clearance, leading to potential misuse.

Mitigation

- **Access Controls:** Implement role-based access controls to limit who can access PII based on their job responsibilities.

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?

ERS shares, receives, or transmits data to/from the following external organizations: Census Bureau, BEA, BLS, EPA, FDA, Coleridge. In most cases ERS receives data for use in agency research. Occasionally ERS will transmit aggregated data for other agencies to use in their work. For example, aggregated data are provided to the Bureau of Economic Analysis for their use in calculating the Gross Domestic Product. Data are transmitted using approved secure data transfer methods such as Kiteworks.

Privacy Impact Analysis: Related to external 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.
- **Data Breaches:** External sharing can lead to data breaches, either through hacking or inadvertent exposure, resulting in unauthorized individuals gaining access to sensitive information.

Mitigation

- **Data Sharing Policy:** Develop a clear policy outlining the conditions under which PII can be shared externally, including legal and compliance requirements (ex.: Computer Matching Agreements, SORNs, Business Agreements).
- **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

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?

The data is not collected by ERS so there are not any procedures that allow individuals to gain access to their information.

What are the procedures for correcting inaccurate or erroneous information?

If a respondent feels they have provided erroneous information to an economic survey, they may contact the agency that collected the data. Contact information is provided in the survey materials sent to the respondent.

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

If a respondent feels they have provided erroneous information to an economic survey, they may contact the agency that collected the data. Contact information is provided in the survey materials sent to the respondent.

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

If a respondent feels they have provided erroneous information to an economic survey, they may contact the agency that collected the data. Contact information is provided in the survey materials sent to the respondent.

Privacy Impact Analysis: Related to redress.

Privacy Risk

- **Inadequate Processes:** If the processes for individuals to seek redress for privacy violations are unclear or cumbersome, it can deter individuals from exercising their rights and lead to unresolved complaints

Mitigation

- **Establish Clear Procedures:** Develop and communicate clear procedures for individuals to submit complaints or requests for redress related to privacy violations.

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?

ERS follows all security procedures put in place by the USDA OCIO, including the use of government furnished equipment and PIV cards. Data are housed on USDA/ERS secure servers inside secure permission-based folders. Staff are trained on data privacy and confidentiality.

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

Researchers that need to work with sensitive data must present justification to their supervisor, the data steward, and their deputy division directors for data development and management. They must also show proof that they have taken the appropriate training and have read the accompanying documentation about working with the data and how to prevent disclosure issues.

How does the program review and approve information sharing requirements?

For researchers the review is done by the supervisor, the data steward, and their deputy division directors for data management. In the case of sharing data with other agencies there is an added layer of approval from senior management.

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

ERS employees must take USDA Records Management training, USDA Information Security Awareness training, Counterintelligence and Insider Threat Awareness training, Scientific Integrity Policy Awareness training, and ERS Confidential Information Protection and Statistical Efficiency Act training. Researchers working with sensitive data must also review security and disclosure rules for the data they are working with.