



National Association of Conservation Districts

August 29, 2006

To: All Conservation Districts
From: Krysta Harden, NACD Chief Executive Officer.
Subject: Comments on Security Requirements

Below for your information is a paraphrased copy of the text of a letter I sent in response to some questions from a conservation district board.

Thank you for your recent letter regarding your conservation district's concerns about the new security requirement for all district employees with access to the federal government's computer system.

Please know that I understand your concerns and that of your employees. In order to better understand this situation, I have had a number of personal meetings with USDA officials and have expressed our concerns regarding the requirements. NACD wants to make sure all district employees are treated fairly and with respect for their privacy.

First, let me explain that these requirements are based on White House and Homeland Security Administration directives for all federal contractors and partners who have access to the federal government's computer system. NRCS has long spoken up for retaining access for non-federal participants including conservation districts. So far, NRCS has won the argument due to the value and important role conservation districts play in the delivery of USDA conservation programs.

However, in order to maintain this access, certain requirements are necessary. Full identification verification is one of the major requirements. OPM uses the credit check portion that is required not to determine the credit balance or specific purchasing habits of the employees but instead it is used to verify that the employee is who they say they are and can prove it by credit records (i.e. owning a home or car, having a student loan, etc.).

All federal employees' identification is verified at the time of employment. However, district employees, who have much of the same access as federal employees, are not all verified. The government just wants to know that a person does exist beyond just a name. We have been assured that the record check does not impact the individual's credit record in any way.

The information is not actively used unless there is a breach in the system that can be traced back to a specific person's computer. The data is not in transition but instead stored until there is a problem. It is treated differently than records that are active. For instance, people who receive benefits, services or paychecks from the federal government are active and are managed differently. Active records are more likely to be lost or misused.

Again, I do understand the concerns surrounding this process. However, the only other option at this point is to have your district disconnect from the USDA computer system. I do hope that this will not be the option your district chooses.

Please be aware there is also a question as to how long individuals who have not completed the background checks will be able to have regular access to USDA offices, equipment and cooperator records that contain sensitive personal information.

Also, know that when I began employment with NACD, a private non-profit association, I was required to complete a full background and credit check. It is a standard business practice in both the business and public sectors for many positions. I cannot say I wanted to do it but did respect the request and the need for verification.

I am working almost daily on this situation and will continue to do so. However, I must explain that the issues are so much larger and more complex than conservation districts' employees and in this time of tightened security measures across the nation, I do not see major changes in federal government policies in the near future.

Sincerely,

Krysta Harden
CEO