

Privacy Impact Assessment Veterinary Services Process Streamlining (VSPS)

Policy, E-Government and Fair Information Practices

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**Privacy Impact Assessment for the
VS Multisystem on Azure Cloud (V-MAC):
Veterinary Services Process Streamlining
(VSPS)**

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Abstract

The U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Veterinary Service (VS) operates Veterinary Services Process Streamlining (VSPS). This system is used by Accredited Veterinarians, Veterinary Technicians, Importers, Lab Employees, State Employees, and Federal Employees to manage critical VS operations for the management and monitoring of animal health and safety. This PIA is being republished to discuss the PII collected, used, maintained and disclosed within VSPS, as well as the privacy risks and mitigation strategies.

Overview

The Animal Health Protection Act (AHPA) provides broad authority for regulating animals that pose a risk to animal health. The AHPA gives the Secretary of Agriculture authority to prohibit or restrict imports or entry of any animal, article, or means of conveyance into the United States if the Secretary determines this is necessary to prevent the introduction or dissemination of any pest or disease of livestock. The Secretary delegates this responsibility to the Animal and Plant Health Inspection Service (APHIS).

Veterinary Services (VS) is a program within APHIS with the primary oversight of animal health protection. VS protects and improves the health, quality, and marketability of our nation's animals, animal products, and veterinary biologics by preventing, controlling, and/or eliminating animal diseases, and monitoring, and promoting animal health and productivity.

Access to VSPS is gained through eAuthentication accounts, and specific roles are granted within the VSPS application. Each authenticated user must create a user profile and request a role. Each user has access to the business profile. A user profile captures the individual's name, email address, phone numbers and address, as well as manage and request VSPS user roles. The business profile module includes the following sections:

1) Animals

This section allows users to add and store animal information so it can later be accessed to add the animal to a Certificate of Veterinary Inspection (CVI) or Equine Infectious Anemia (EIA)/Coggins form.

2) Address Book

The address book section allows users to add personal contact information so it can be accessed quickly at a later time to add the contact to a CVI, EIA/Coggins form, or Animal Importation.

3) Practices

The practices section allows a user to create a “Practice” and invite other VSPS users to the practice. This gives the users the ability to add animals and/or people to the Practice address book, which is shared among the members of the Practice. When users are also linked within a Practice, it gives the ability for linked practice members to create/edit/view other members CVIs and EIA/Coggins test records.

VSPS MODULES

VSPS consists of seven modules. These modules include:

1) Veterinary Accreditation

The National Veterinary Accreditation Program (NVAP) allows licensed veterinarians to become a NVAP accredited veterinarian. NVAP accredited veterinarians are authorized to certify the health status of livestock and other animals.

A USDA Accredited Veterinarian is a one who has completed formal training from the National Veterinary Accreditation Program (NVAP) in the state(s) they are licensed to practice. This module allows accredited veterinarians to electronically file Form VS Form 1-36A to renew their accreditation with USDA.¹ Through this module, accredited veterinarians may submit an accreditation application for renewal, update contact information, apply for authorization in an additional State, and/or change an accreditation category.²

VSPS includes a public search tool called *Find an Accredited Veterinarian*.³ Any online user may search for accredited veterinarians by state, county, and accreditation category. The search tool returns a list of accredited veterinarians and includes the name and contact information for each result. VS obtains explicit authorization from accredited veterinarians to release their business information publicly.

2) Interstate

The Interstate module allows an authenticated user (depending on VSPS role) to create, issue, find, view, and report on the movement of animals within the U.S. This module also supports the process for creating Interstate Certificates of Veterinary Inspection (CVI). A CVI is a form completed by an accredited veterinarian and used to verify the general good health of an animal. CVI’s contain information about the origin and destination of the animal(s), accredited veterinarian, animal description or identification number, vaccination record, and statement of health based on physical examination. Accredited Veterinarians sharing records within this module include

¹ https://www.aphis.usda.gov/library/forms/pdf/VS_1_36A.pdf

² A veterinarian may be accredited as a Category I veterinarian or a Category II veterinarian. A veterinarian who is accredited under Category I is only authorized to perform accredited duties on Category I animals, as defined in § 160.1. A veterinarian who is accredited under Category II is authorized to perform accredited duties on both Category I animals and Category II animals. More information on Category I and II available at [USDA APHIS | Category I and II Animals](#).

³ <https://vsapps.aphis.usda.gov/vsps/public/VetSearch.do>

CVI data, test record information, business contact and animal information. The sharing of records occurs among linked practice members with an eAuthentication account and appropriate permission.

3) Live Animal Import

APHIS regulates the import of certain animals into the U.S. to ensure they do not introduce foreign animal diseases or communicable diseases into American livestock, birds, or aquaculture. These commodities must be declared to APHIS for import inspection upon arrival and are subject to inspection and/or quarantine and/or further treatments prior to release into the United States or, if found non-compliant with import requirements, refused entry into the U.S. The module also allows importers to create an importation request and submit it to the port they will be crossing through.

The Live Animal Import (LAI) application is an offline component to this module. Animal Import documents may be created and synced to VSPS. The same data that is collected and forms that are created in the Live Animal Imports module in VSPS can be collected in the LAI Offline application. There is also the capability to move data from the LAI offline application to Mobile Information Management (MIM) Manager, then to a PDA to capture data in the field. This technology allows the user to capture the data in field with a personal desktop assistant, and then when back at the duty location, use the Desktop Management application to synchronize and upload the data back to LAI and sync to get the data to VSPS.

4) Labs

A Coggins test is a blood test used to identify the presence of antibodies for equine infectious anemia (EIA), a potentially fatal disease with no current treatment available. Lack of a vaccine or treatment for EIA makes testing crucial for preventing spread by ensuring carriers are not moved or allowed in close proximity with other horses. An accredited veterinarian performs a Coggins test by drawing blood from the horse and sending it to an accredited lab for analysis.

This module allows Accredited Veterinarians to create an Equine Infectious Anemia VS 10-11 test record in VSPS.⁴ VS Form 10-11 is the official USDA form for EIA test requests. VS 10-11 forms are only available to accredited veterinarians and there are no approved fillable pdfs of the form for submissions. The test records are electronically submitted to an approved laboratory that, in turn, enters the results in VSPS, which creates an Official EIA VS 10-11 form.

Key information on this document includes information on the owner and location of the horse, details of the horse to include identification and/or description/markings, the veterinarian who drew blood for the test, the lab that performed the test, and test details and results.

⁴ https://www.aphis.usda.gov/animal_health/animal_diseases/eia/downloads/vs_form10-11_inst.pdf

5) Product Import

This module keeps track of the facilities inspected and approved to receive certain restricted animal products & animal by-products for further treatment and also keeps track of the products and by-products that were received and treated.

6) Product Export

This module keeps track of the facilities that are inspected and approved by APHIS to export certain animal products & animal by-products to certain foreign countries.

7) Animal Import Center Reservation

Brokers use this module to reserve and pay for space at an Animal Import Center for the quarantine of their animals being imported. Certain animals from other countries impose a risk of harboring and spreading diseases and may require a quarantine period before entering. These animals must be quarantined upon arrival in the US at an APHIS Animal Import Center for at least 7 days. The module also allows federal employees at the import centers to manage the reservations and create the required paperwork.

The types of PII collected through the above processes are names, addresses and contact information for accredited veterinarian, importer, owner, origin, destination, broker, shipper and consignee. The data entered into the online fields are used to generate the official forms needed for importation of live animals and for traceability purposes in the event of an animal disease outbreak.

Section 1.0 Characterization of the Information

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

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

User Profile: full name, email, address, and phone numbers.

Business Profile: The Animal book includes the owner and location of the animal information including the full name, address, and phone number. The person address book includes the full name, address, email address and phone numbers. The practice book includes the practice name, address, and phone number.

Veterinarian Accreditation: name, date of birth, business name, home and business mailing addresses, telephone numbers, the accreditation and license status of veterinarians, email address, state in which licensed or legally able to practice veterinary medicine, veterinary license number, and national accreditation number (NAN).

Live Animal Import: name, address, email, and phone number for the importer, destination, broker, shipper, and consignee.

Animal Import Center Reservations: name, address, and contact information of the importer.

Interstate CVI: name, address and contact information for the origin, destination, owner/consignor/shipper, consignee/receiver, and carrier, as well as the accredited veterinarians license and national accreditation number, address, and contact information.

Labs: name, address and contact information for the owner and location of the horse along with the accredited veterinarian’s national accreditation number, address and contact information and the receiving lab name, city, state, and phone number.

Product Import: name, address, and contact information for the approved establishments.

Product Export: name, address, and contact information for the product export facility.

1.2 What are the sources of the information in the system?

The information entered in VSPS is entered directly from the authenticated user. Accredited Veterinarians, Lab Technicians, State Vet Offices, and Importers/Brokers use VSPS to support the management and health of livestock animals. The following role types provides the following information:

Accredited veterinarians:

- Create an electronic eCVI
- Create and submit electronic Coggins test request paperwork to participating NVSL-approved labs
- Set up a practice to allow document sharing among practice members including CVI data, EIA/Coggins test record information, contacts and animal information
- Submit an accreditation application for renewal, update your contact information, apply for authorization in an additional State, and/or change your accreditation category.

Veterinary Technicians:

- Create an electronic Interstate CVI to submit to the accredited vet for approval.
- Create an electronic Coggins (EIA) test record to submit to the accredited vet for approval. .

Animal Importers/Brokers can:

- create and submit documents needed for importation into the US as well as reserve space at the federal animal import center in the US.
- Check status on importations and reservations.

Lab Employees can:

- Enter results on electronic Coggins (EIA) forms submitted in VSPS.
- Check accreditation status of veterinarians.

State Employees can:

- View Interstate eCVIs for your State and accept or reject the eCVIs
- Enter Retro CVIs (rCVIs)
- States may enter already issued paper Certificates of Veterinary Inspection into the retrospective CVI portion of the module for electronic record-keeping purposes.
- View Coggins (EIA) tests completed in your State
- Check accreditation status of veterinarians
- Add State Certificate statements required to be on eCVIs
- View International animal imports that have a destination of your State
- View approved product import establishments

Federal Employees can:

- Create/manage/view animal importations
- Create/manage/view reservations and barn space at the animal import centers
- NVAP staff can manage accredited veterinary records including National Accreditation Numbers, reaccreditation timelines and contact information for accredited veterinarians around the country
- Check accreditation status of veterinarians
- Manage/view records of establishments that are approved to export animal products
- Manage/view records of establishments that are approved to import animal products into the US
- View Interstate eCVIs

1.3 Why is the information being collected, used, disseminated, or maintained?

Veterinary Accreditation: Accredited veterinarians are veterinarians authorized by APHIS to perform certain services to control and prevent the spread of animal diseases within the United States and Internationally. VS relies upon accredited veterinarians

to attest to the health of animals at the time of inspection being exported to foreign countries or being moved between or within States. A veterinarian must be accredited in each state in which he or she performs Federal work and able to be contacted for educational and renewal purposes as well as in the event of an animal health emergency or traceback.

Live Animal Import: All animals entering the United States must go through an Import Process. The names and contact information ensure that VS knows where the animals originated from, their intended destination and the contact information for all parties involved in the importation and shipment.

Interstate Animal Movement: All animals being moved from State to State are required to go through an Interstate Movement Certification Process. Each animal must be inspected by an accredited veterinarian and will be subject to the target State's entry regulations. The names and contact information ensure that VS knows where the animals originated from, their intended destination and the contact information for all parties involved in the importation and shipment.

Labs: Accredited Veterinarians that need to create an Equine Infectious Anemia (EIA/Coggins) VS 10-11 test record can create the test record and submit it to an online laboratory that can enter the results in VSPS which creates an Official EIA VS 10-11 form. The VS 10-11 form can be printed to go with the horse(s) when traveling. The accredited veterinarian and owner name, address and contact information are needed to supply results, in the event of a positive result or additional information is needed.

Facilities (Product Import and Product Export): Allows current National Import Export Services (NIES) animal import product staff to enter inspection information about facilities that receive and treat animal import products from a number of countries around the world.

Contact name, address and contact information are collected to schedule inspections and mail the necessary approvals to the facilities.

1.4 How is the information collected?

The information is collected directly from authenticated users via VSPS or LAI Offline and synchronized to VSPS.

1.5 How will the information be checked for accuracy?

All data collected and stored in the VSPS system is provided by either a customer (importer, State Regulatory Official (SRO), Accredited Veterinarian, or Lab Technician) or VS personnel.

All data is entered directly by users with roles. Each data entry field within the online forms is appropriately coded and labeled to ensure data is entered into the appropriate

spaces. VSPS provides users an opportunity to review and edit information prior to the submission of data.

Once an online CVI or EIA form is processed to completion, the data is retained as read-only and may not be changed. Data integrity is the assurance that original data is accurate and complete. To ensure the data integrity, original data is protected from accidental modification falsification, or deletion. VSPS implements controls to ensure that records that contain data are complete, accurate and maintained.

1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?

- The Animal Health Protection Act, 7 U.S.C. Chapter 109 ;
- Title 9, Code of Federal Regulations (9 CFR), Chapter 1
- Homeland Security Presidential Directive-7;
- Part 85 Animal Disease Traceability U.S.C. 8301–8317; 7 CFR 2.22, 2.80, and 371.4.

Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.

APHIS VS carries out its mission under the AHPA, which authorizes APHIS VS to establish a veterinary accreditation program, manage the movement animals or articles into the United States, and quarantine certain animals to mitigate the spread of diseases. VS developed VSPS to carry out its responsibilities under AHPA. The system is designed to only collect the minimum about of information to identify the points of contact for the animal, as well as accredited veterinarians and state lab technicians. To mitigate the risk of overcollection, the system is coded and preconfigured to collect data fields cleared through the Paperwork Reduction Act.

Unauthorized disclosure of customer PII is mitigated by having the following in place:

- All access to VSPS is controlled by the USDA eAuthentication system.
- Before approval the roles needed by users must be entered into the User Management System (UMS) which goes through multiple approvals. This serves to mitigate the risk of unauthorized disclosure.
- The application limits access to relevant information and prevents access to unauthorized information.
- All USDA users receive formal system training and are required to sign Rules of Behavior on an annual basis as part of the USDA mandatory information system security awareness training.
- At the login screen of the application the warning banner must be acknowledged before users are allowed access.

Section 2.0 Uses of the Information

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.

2.1 Describe all the uses of information.

APHIS VS uses the information to manage and track:

- Animal importations into the U.S.
- Reservations and barn space at the animal import centers
- Accredited veterinary records including national accreditation numbers, reaccreditation timelines and contact information for accredited veterinarians around the country
- Accreditation status of veterinarians
- Records of establishments that are approved to export animal products
- Records of establishments that are approved to import animal products into the U.S.
- Interstate eCVIs
- Coggins/EIA tests

The data collected within VSPS will also be used for research, investigative and litigation support, comparative and risk analysis.

2.2 What types of tools are used to analyze data and what type of data may be produced?

Data Integration Services (DIS) is used to analyze the data collected in VSPS. Reports may be produced in DIS and exported to excel if desired. Graphs and reports may be produced in DIS. The reports in DIS may be exported to Excel. All reporting tools are accessible to VS employees. Data is used to produce summary reports for stakeholders, and detailed internal reports, which may contain name, address, and phone information for persons identified in VSPS.

2.3 If the system uses commercial or publicly available data please explain why and how it is used.

VSPS uses Google Maps to identify directions to a specific address for the interstate movement of animals.

2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.

- All access to VSPS is controlled by the USDA eAuthentication system.

- VSPS access control limits access to relevant information and prevents access to unauthorized information through role-based access.
- Access to personal information is restricted to individuals with a need to know in order to perform functions associated with their job.
- At the login screen of the application the warning banner must be acknowledged before users are allowed access.
- Security controls within the application are reviewed each year by independent assessors in order to verify that they are operating as expected.
- All USDA users are required to sign Rules of Behavior on an annual basis as part of the USDA mandatory information system security awareness training. Failure to comply with Rules of Behavior could result in strict disciplinary action, including termination or other adverse action that is deemed appropriate.

On the bottom of every page where a user enters PII data, before saving they must check a box that has this statement:

I affirm that the personal information (such as name, address, D.O.B. etc.) I entered (or edited), either from a previously completed form or directly from the source, has been entered completely, accurately, and correctly.

Section 3.0 Retention

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

3.1 How long is information retained?

The APHIS VSPS records are maintained permanently until a record retention schedule has been approved.

3.2 Has the retention period been approved by the component records officer and the National Archives and Records Administration (NARA)?

No.

3.3 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

There is an inherent risk that PII can be exposed if retained longer than necessary to fulfill specified purposes. The proposed schedule will align and supports mission of APHIS VS. Until NARA formally approves the proposed records schedule, all records will be retained permanently.

Mitigation: VS designed VSPC to only collect and use the minimum amount of information necessary for the appropriate oversight of animal health. VSPC uses security controls to secure the information and limits access to the information within VSPC to ensure that data is restricted to only authorized individuals. Authorization for access is strictly enforced and monitored. These security controls further mitigate the risks associated with unauthorized access and disclosure of PII.

Section 4.0 Internal Sharing and Disclosure

The following questions are intended to define the scope of sharing within the United States Department of Agriculture.

4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?

At this point, no other Federal or internal USDA agencies have been identified as requiring access to the data contained in VSPS.

Data is shared with the VS Data Integration Services (DIS) system hosted on Palantir to support reporting needs.

4.2 How is the information transmitted or disclosed?

Data can be retrieved in DIS only by personnel who successfully authenticate using their e-Authentication PIV or e-authentication username/password credential and are authorized with specific DIS role(s) related to the VSPS reports that are needed. Access to DIS is completed through UMS which requires multiple levels of approval.

4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.

Unauthorized disclosure of personal information, as identified in Section 1.1 above, is the primary privacy risk to information shared internally. Risks are mitigated through access control only allowing approved users access to the reports.

Section 5.0 External Sharing and Disclosure

The following questions are intended to define the content, scope, and authority for information sharing external to USDA which includes Federal, state and local government, and the private sector.

5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?

VSPS includes two public search tools – 1) Accredited Veterinarians and 2) Approved Establishments. The Accredited Veterinarians search tool allows the public to locate and contact accredited veterinarians in a specific geographic area.⁵ The Approved Establishments search allows the public to search for organizations that are authorized to process animal product imports by state and item type.⁶

Google Maps is currently used by Accredited Veterinarians to identify directions to a location of an animal. This is so the veterinarian can examine the animal for interstate movement approval. The VSPS application re-directs users to the Google Maps website. Prior to the transfer to Google Maps, VSPS informs the veterinarian that the user is being redirected to a third-party site and that the any interaction with the site is subject to the third party privacy policies.

VSPS sends Interstate CVI data to the USDA Enterprise Messaging Service (EMS). States can subscribe to receive the Interstate CVI data where they are the origin or destination state electronically from EMS. States that want to become a subscriber in EMS must complete and sign an APHIS 513 form (APHIS new user account and privileged access control form) which is then must be signed by an APHIS official before the state is setup as a subscriber.

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, records maintained in the system may be disclosed outside USDA as follows:

- (1) To the State animal health official in each State, State veterinary examining or licensing boards, and the American Association of Veterinary State Boards to certify accreditation or license status or exchange information regarding disciplinary action(s);
- (2) To the public for the purpose of locating and contacting an accredited veterinarian who has granted APHIS permission to provide business contact information; and for the purpose of locating and contacting an approved establishment in their state; To individuals identified by the company to receive email notifications from the system related to expiration date and status of submitted inspection paperwork (for product export facilities); (3) To U.S. Customs and Border Protection Agricultural Specialists responsible for completing paperwork to authorize transfer of restricted imports to approved establishments;
- (4) To foreign government animal health officials when such information is required to facilitate exports;
- (5) To the appropriate agency, whether Federal, State, local, or foreign, charged with responsibility of investigating or prosecuting a violation of law or of enforcing, implementing, or complying with a statute, rule, regulation, or order issued pursuant thereto, of any record within this system when information available indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature, and either arising by general statute or particular program statute, or by rule, regulation, or court order issued pursuant thereto;

⁵ <https://vsapps.aphis.usda.gov/vsps/public/VetSearch.do?method=display>

⁶ <https://vsapps.aphis.usda.gov/vsps/public/AESearch.do>



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- (6) To the Department of Justice when: (a) The agency, or any component thereof; or (b) any employee of the agency in his or her official capacity; or (c) any employee of the agency in his or her individual capacity where the Department of Justice has agreed to represent the employee; or (d) the United States is a party to litigation or has an interest in such litigation, and the use of such records by the Department of Justice is deemed by the agency to be relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the Department of Justice is a use of the information contained in the records that is compatible with the purpose for which the records were collected;
- (7) For use in a proceeding before a court or adjudicative body before which the agency is authorized to appear when: (a) The agency, or any component thereof; or (b) any employee of the agency in his or her official capacity; or (c) any employee of the agency in his or her individual capacity where the agency has agreed to represent the employee; or (d) the United States is a party to litigation or has an interest in such litigation, and the agency determines that use of such records is relevant and necessary to the litigation; provided, however, that in each case, the agency determines that disclosure of the records to the court is a use of the information contained in the records that is compatible with the purpose for which the records were collected;
- (8) To appropriate agencies, entities, and persons when: (a) The agency suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; (b) the agency has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, a risk of identity theft or fraud, or a risk of harm to the security or integrity of this system or other systems or programs (whether maintained by the agency or another agency or entity) that rely upon the compromised information; and (c) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in co and prevent, minimize, or remedy such harm;
- (9) To contractors and other parties engaged to assist in administering the program. Such contractors and other parties will be bound by the nondisclosure provisions of the Privacy Act;
- (10) To USDA contractors, partner agency employees or contractors, or private industry employed to identify patterns, trends, or anomalies indicative of fraud, waste, or abuse. Such contractors and other parties will be bound by the nondisclosure provisions of the Privacy Act;
- (11) To a congressional office from the record of an individual in response to an inquiry from the congressional office made at the written request of that individual; and
- (12) To the National Archives and Records Administration or to the General Services Administration for records management inspections conducted under 44 U.S.C. 2904 and 2906.
- (13) Information security breaches: To appropriate agencies, entities, and persons when (1) USDA suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; (2) the Department has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of this system or other systems or programs (whether maintained by the Department or another agency or entity) that rely upon the compromised information; and (3) the disclosure made to such agencies,

entities, and persons is reasonably necessary to assist in connection with the Department's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm.

(14) To comply with FFATA and similar statutory requirements for public disclosure in situations where records reflect loans, grants, or other payments to members of the public: USDA will disclose information about individuals from this system of records in accordance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. No.109-282; codified at 31 U.S.C. 6101, et seq.); section 204 of the E-Government Act of 2002 (Pub. L. No.107-347; 44 U.S.C. 3501 note), and the Office of Federal Procurement Policy Act (41 U.S.C. 403 et seq.), or similar statutes requiring agencies to make available publicly information concerning Federal financial assistance, including grants, subgrants, loan awards, cooperative agreements and other financial assistance; and contracts, subcontracts, purchase orders, task orders, and delivery orders

5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of USDA.

Yes. The sharing of personally identifiable information outside the Department is compatible with the original collection. The currently published SORN: USDA/APHIS-2, Veterinary Services—Records of Accredited Veterinarians.

APHIS VS works with State authorities on data protection through the use of Non-Disclosure Agreements (NDAs), Interconnection Security Agreements (ISAs), Memorandum of Understandings (MOUs) and other agreements.

5.3 How is the information shared outside the Department and what security measures safeguard its transmission?

For any personal identifying information other than the Veterinarian's name, that may be sent via an external report, the privacy information is removed from the document. When an external recipient is under contract with USDA, Non-Disclosure Agreements are used to prevent unauthorized information transfer.

The Interstate CVI data that is sent to the Enterprise Messaging Service (EMS) is all transmitted securely within the Azure GCC (Government Community Cloud).

5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.

Unauthorized disclosure of personal information, as identified in Section 1.1 above, is the primary privacy risk to information shared externally to the USDA. Risk is mitigated by access control and is only used for authorized purposes.

Section 6.0 Notice

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

6.1 Does this system require a SORN and if so, please provide SORN name and URL.

USDA/APHIS-2, Veterinary Services—Records of Accredited Veterinarians.

6.2 Was notice provided to the individual prior to collection of information?

APHIS VS provides official notice to account holders through the publication of this PIA, and through associated SORNs.

6.3 Do individuals have the opportunity and/or right to decline to provide information?

The completion and submission of the information is voluntary, and individuals have opportunity to decline to provide information. Failure to complete the online forms may prohibit VS, accredited veterinarians, and state official from processing and adjudicating the request potentially resulting in the inability to transport animals.

6.4 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?

By completing the forms online, individuals have provided consent to the use of the information. VSPS requires information about the veterinarian, owner, transporter, handler, and state official, as well as the animals, to make an informed decision and maintain an accurate inventory of records. Individuals who enter data into VSPS may decline to provide information at any time. The use of the information will be noted in the routine uses of the SORN and this PIA.

6.5 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.



The System of Record Notice is the official notice. There is the risk that individuals are unaware that their information is collected and used by VSPS. This risk is mitigated by providing notice to individuals through the privacy policy link in VSPS, this PIA, the associated SORN, and training videos. At the time of the data collection, the person entering the data into the system has collected the information from the individual so they are aware their data is being collected for the required paperwork.

On the bottom of every page where a user enters PII data, before saving they must check a box that has this statement:

I affirm that the personal information (such as name, address, D.O.B. etc.) I entered (or edited), either from a previously completed form or directly from the source, has been entered completely, accurately, and correctly.

Section 7.0 Access, Redress and Correction

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

7.1 What are the procedures that allow individuals to gain access to their information?

VSPS allows users to access their profile within the system. In the event the users are unable to access information within VSPS, users may contact to helpdesk email and phone number for additional assistance, which can be found on the VSPS home page after logging in.

Additionally, Individuals may file a Privacy Act or FOIA request to view their record by submitting a FOIA request online through USDA's Public Access Link (PAL), or through mail or fax.⁷

USDA – Animal and Plant Health Inspection Service
FOIA/PA Director
4700 River Road, Unit 50
Riverdale, MD 20737
Facsimile: 301-734-5941
Email: APHISPrivacy@usda.gov

Further information about Privacy Act and FOIA requests for APHIS records is available at <https://www.aphis.usda.gov/aphis/resources/foia>.

7.2 What are the procedures for correcting inaccurate or erroneous information?

⁷ <https://efoia-pal.usda.gov/App/Home.aspx>

USDA APHIS offers multiple avenues for individuals to correct inaccurate or erroneous information. Individuals may update their user profile, business, and animal information directly within VSPS, they may contact the Help Desk email or by phone, or submit a Privacy Act request to the FOIA/Privacy Officer. Each user is assigned an online account and are offered self-services tools to manage the data stored in their account. Individuals can review and edit their data at any time.

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

Individuals are informed about the procedures for correcting their information while creating a VSPS user profile. Additionally, this PIA and the associated SORN explains how an individual may correct his or her information.

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

Not applicable, as formal redress is offered to VSPS users.

7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.

There is minimal privacy risk related to redress. USDA provides individuals with access, amendment, or correction to their records through multiple avenues.

Section 8.0 Technical Access and Security

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

8.1 What procedures are in place to determine which users may access the system and are they documented?

Access to the VSPS is role based and is approved by an authorized APHIS VS official. Criteria, procedures, and controls are documented.

8.2 Will Department contractors have access to the system?

Yes.

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

All APHIS employees that are provided access to the VSPS application are required to complete annual USDA Information Technology (IT) Security Awareness Training and must sign the accompanying Rules of Behavior prior to receiving access to the information system.

APHIS VS also offers role-based training specific to external customer users. There is a library of training materials which includes computer-based training videos and guidance documentation on how to appropriately use VSPS.⁸

8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?

The VSPS renewed its Authority to Operate (ATO) on September 25, 2023 by completing an Assessment and Authorization. The ATO for this system will be renewed on or before September 25, 2026.

8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?

Formal auditing measures for VSPS include security assessments performed by USDA APHIS at least annually and independent security assessments performed in support of Assessment and Authorization efforts. The independent assessments will be performed per the timeframe of VSPS ATO schedule.

As to technical safeguards:

- Access control technical measures are in place and operating to ensure only users with approval can access the data, and to ensure only the minimum access and privileges are granted to enable users to perform the job function. User access is audited on a continual basis.
- Operational technical safeguards to prevent data misuse begin with access control. VSPS employs TLS encryption to protect data during transmission and enforces multifactor authentication for user access. Password controls, procedures, responsibilities, and policies follow USDA departmental standards. APHIS employees must use LincPass to access their computer and the APHIS network, including the VPN. There is no action that can be performed within the VSPS without identification and authentication.
- At the USDA and APHIS Enterprise level, intrusion detection and intrusion prevention, firewalls and antivirus measures are employed on a continuous basis.

8.6 Privacy Impact Analysis: Given the sensitivity and scope of the information collected, as well as any information sharing conducted

⁸ https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/nvap/ct_vsps_interstate_library

on the system, what privacy risks were identified and how do the security controls mitigate them?

Unauthorized disclosure personal information is the primary privacy risk to information shared both internally and externally. This risk is mitigated by role based accessed by users who have logged in with their e-Authentication PIV or e-authentication username/password credential and have been authorized with specific VSPS role(s). User access and changes to data are captured in audit logs. All USDA users accessing the system have been provided training in information and PII handling.

Section 9.0 Technology

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware and other technology.

9.1 What type of project is the program or system?

The VSPS is an operational major application. The data is used to support Veterinary Accreditation, Import of Animals, Interstate Movement of Animals (Interstate CVIs), Labs, and Facility inspections (Product Import and Product Export). The data collected within VSPS is also used for research, investigative and litigation support, comparative and risk analysis.

9.2 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.

The VSPS application does not employ technology that may raise privacy concerns.

Section 10.0 Third Party Websites/Applications

The following questions are directed at critically analyzing the privacy impact of using third party websites and/or applications.

10.1 Has the System Owner (SO) and/or Information Systems Security Program Manager (ISSPM) reviewed Office of Management and Budget (OMB) memorandums M-10-22 “Guidance for Online Use of Web Measurement and Customization Technology” and M-10-23 “Guidance for Agency Use of Third-Party Websites and Applications”?

Yes.

10.2 What is the specific purpose of the agency’s use of 3rd party websites and/or applications?

Google Maps are currently used by Accredited Veterinarians to identify directions to a location of an animal. This is so the Veterinarian can examine the animal for interstate movement approval. The VSPS application re-directs users to the Google Maps website.

10.3 What personally identifiable information (PII) will become available through the agency’s use of 3rd party websites and/or applications.

VSPS does not receive any PII from third party websites or applications.

10.4 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be used?

N/A.

10.5 How will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be maintained and secured?

N/A.

10.6 Is the PII that becomes available through the agency’s use of 3rd party websites and/or applications purged periodically?

N/A.

10.7 Who will have access to PII that becomes available through the agency’s use of 3rd party websites and/or applications?

N/A.

10.8 With whom will the PII that becomes available through the agency’s use of 3rd party websites and/or applications be shared - either internally or externally?

N/A.

10.9 Will the activities involving the PII that becomes available through the agency’s use of 3rd party websites and/or applications require either the creation or modification of a system of records notice (SORN)?

N/A.

10.10 Does the system use web measurement and customization technology?

VSPS does not use web measurement or customization technology.

10.11 Does the system allow users to either decline to opt-in or decide to opt-out of all uses of web measurement and customization technology?

N/A.

10.12 Privacy Impact Analysis: Given the amount and type of PII that becomes available through the agency's use of 3rd party websites and/or applications, discuss the privacy risks identified and how they were mitigated.

N/A.



Responsible Officials

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Approval Signature

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