



# **Animal and Plant Health Inspection Service (APHIS)**

## **Privacy Impact Assessment**

### **Comprehensive Electronic Permitting System (ePermits)**

*Revision: 1.3*

*APHIS*

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## Document Information

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Revision History			
Revision	Date	Author	Comments
1.0	07/20/04	John Connors, SAIC	Initial publication of PIA
1.1	07/20/05	John Connors, SAIC	First revision of PIA for Certification and Accreditation
1.2	12/17/07	John Connors, SAIC	PIA revised for System of Records Notice
1.3	03/31/09	Faisal D'Souza, ITS Corp.	Revise PIA for Certification and Accreditation under new template

Distribution List			
Name	Title	Agency/Office	Contact Information



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# 1 System Information

System Information	
Agency:	USDA / APHIS
System Name:	Comprehensive Electronic Permitting System (ePermits)
System Type:	<input checked="" type="checkbox"/> Major Application <input type="checkbox"/> General Support System <input type="checkbox"/> Non-major Application
System Categorization (per FIPS 199):	<input type="checkbox"/> High <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Low
Description of System:	<p>ePermits consists of a set of secure Web-based interfaces to an Oracle database. It includes a permit application interface that supports the entry, update, submission, and tracking of APHIS permit applications by the public. It also contains an interface that supports regulatory processing and issuance of said permits by APHIS staff. In short, ePermits:</p> <ul style="list-style-type: none"> <li>• Provides a Web-based tool that enables the public to apply for, check status of application(s), and receive APHIS permits on-line.</li> <li>• Supports the electronic issuance of permits.</li> <li>• Enables APHIS users and officials in DHS to obtain rapid verification of the authenticity and accuracy of an import permit.</li> <li>• Standardizes the public interface to the APHIS permitting process.</li> <li>• Enhances the integrity and efficiency of the APHIS permitting process.</li> <li>• Supports on-line credit card payments through Pay.gov.</li> </ul> <p>ePermits supports three APHIS programs -- PPQ, BRS and VS. In April 2006, ePermits completed an independent Certification and Accreditation. This Privacy Impact Assessment addresses the data, uses, and functionality for ePermits.</p>
Who owns this system? (Name, agency, contact information)	<p>Alison I. Young            System Owner            Branch Chief, Project Management Office, Information Technology Development Coordination            United States Department of Agriculture            4700 River Road, Unit 144            Riverdale, MD 20737  <a href="mailto:Alison.I.Young@aphis.usda.gov">Alison.I.Young@aphis.usda.gov</a> 301-734-5226</p>



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## 2 Data Information

### 2.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	<p>Customer – Customers enter permit application information, check the status of permit applications, and view permit responses. Customers also collaborate with the APHIS Permit Staff to verify accuracy of the permit and to ensure all requirements are met.</p> <p>The system uses the following information about customers:</p> <ul style="list-style-type: none"> <li>• Name, address (including mailing address), telephone number (including work, FAX and home numbers), email address, and organization name and job function.</li> <li>• Name, quantity, country of origin and intended use of regulated articles (organisms and materials) to be imported.</li> <li>• Destination addresses for shipments of regulated articles, including contact name and phone number.</li> <li>• Planned dates and ports of entries for shipments, planned quantities of permitted articles in shipments.</li> <li>• For permits that require fee payments, the system uses payment amount, payment date, the payment transaction number, and either the last 4 digits of the credit card number used, the check number, or the APHIS user fee account number.</li> <li>• For BRS permit applications, the applicant may declare that some permit application information is Confidential Business Information (CBI), a designation allowed under Section (b)(4) of the Freedom of Information Act, which exempts from disclosure certain types of information related to trade secrets and commercial or financial information.</li> </ul> <p>The system uses the following information about employees:</p> <ul style="list-style-type: none"> <li>• Name, address (including mailing address), telephone number (including work, FAX and home numbers), email address, and organization name and job function.</li> <li>• For APHIS permits staff who signs permits, the system uses a digital image of the handwritten employee signature for printing on the permit.</li> </ul> <p>Other - State regulatory agencies review permit applications, and enter comments about draft permit conditions. Agricultural Inspectors from the U.S. Customs and Border Protection use ePermits to view permits and confirm the validity of permits.</p> <p>The system uses the following information about other: Name, address (including mailing address), telephone number (including work, FAX and home numbers), email address, and organization name and job function.</p>



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No.	Question	Response
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	Sources of the data in the system.	Information for permit applications is input by permit applicants (importers, import brokers, and researchers). Based on the information provided by applicants, APHIS permits staff in BRS, PPQ and VS draft permit conditions/restrictions, route a copy of the permit application and draft permit conditions to one or more State regulatory officials to review and add comments. Finally, APHIS permits staff review comments from the States and issue a final permit.
4.1	What data is being collected from the customer?	The information collected from the applicant typically consists of information about the permittee (name and contact information), the names of the regulated articles that require a permit, the origin and destination of the regulated articles, and the intended use of the articles. A permit application may also include a request for shipment labels if needed. A permit application may also contain confidential business information (i.e., location, or name of persons involved), or information needed to pay an application fee. A permit typically contains the information in the permit application as well as permit conditions or restrictions.
4.2	What USDA agencies are providing data for use in the system?	None. Only APHIS files and databases are used in this system.
4.3	What state and local agencies are providing data for use in the system?	Regulatory Officials from the State Departments of Agriculture are providing data for use in ePermits.
4.4	From what other third party sources is data being collected?	Some ePermits users submit BRS application files electronically from their own private systems using published standards. All ePermits users login to ePermits through USDA eAuthentication services. Payments for permit application fees are made through Pay.gov, which is operated by the U.S. Treasury Department.



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No.	Question	Response
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	Applications are checked for completeness based on requirements defined by APHIS. Some completeness checks are automated and some are manual. For example, there are required fields in the system where the permittee is required to enter data before proceeding to the next page of the application.
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Data collected from USDA sources are checked for completeness and accuracy by USDA regulated policies and procedures.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	"Not applicable. No data from sources other than USDA records will be collected and maintained in this system."

### 2.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	The principle purpose of collecting data from an individual is to collect information related to the application of a permit, fees associated with permits, and to track status information relating to issuance of a permit and the final outcome.
7	Will the data be used for any other purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 8.
7.1	What are the other purposes?	Data will also be used to manage and issue permits and notifications; perform inspections, investigations, and permit-related activities; prepare permits, letters, and other documents; generate reports to evaluate quality control and effectiveness of the program; determine if the action requested in the permit application would be additionally subject to other Federal or State authorities; and facilitate and account for payments.



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No.	Question	Response
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.3	How will the new data be verified for relevance and accuracy?	Not Applicable
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	<p>APHIS may disclose information in the ePermits system to the Department of Homeland Security's Customs and Border Protection agency, which inspects shipments that arrive at United States ports for compliance with permit Conditions; Federal, State, and local government officials, employees, or contractors, and other parties engaged in administering the program; and State government regulatory officials in the State of destination for review and comment. Other routine uses of this information include releases related to investigations pertaining to violations of law or related to litigation.</p>
11	Will the data be used for any other uses (routine or otherwise)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 13.



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No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	The ePermits security plan includes management, operational, and technical controls to prevent misuse of data by system users. Security mechanisms include firewalls, system hardening, automatic session expiration, automatic password expiration, and virtual private database functionality.
13	Are processes being consolidated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	

### 2.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	The data retention schedule for electronic records in ePermits is 15 years, consistent with retention schedules for policy-related information.
14.2	What are the procedures for purging the data at the end of the retention period?	The ePermits Security Plan identifies the following activities: sanitization or degaussing of system peripherals such as disks that are retired or replaced during the life of the project, sanitization of disks for client systems when employees leave the agency, and sanitization or degaussing of server disks or storage media for retired or outdated systems.
14.3	Where are these procedures documented?	The ePermits Security Plan
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Permit applications and permit data are retained in the system according to approved records management schedule. APHIS Permit Staff ensures that determinations are recorded in the system, as well as the information used to make the determination. Each APHIS program office issuing permits ensures that determinations are made about whether the data is sufficiently accurate, relevant, timely, and complete enough to ensure fairness by doing periodic quality control checks.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



## 2.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	DHS/CBP personnel will use data from the system to ensure shipments arriving in U.S. ports have import permits.
17.2	Who is responsible for assuring the other agency properly uses the data?	USDA's National Information Technology Center houses the ePermits servers and implements all security procedures. The ePermits Project Manager along with APHIS Program Managers are responsible for overseeing operations and implementing all management and operational controls.
18	Is the data transmitted to another agency or an independent site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

## 2.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Data in the system is accessible to APHIS employees consisting of: permit writers, managers, system administrators, database administrators, and PPQ inspectors. Likewise, DHS Customs and Border Protection (CBP) inspectors and state regulatory officials will also have access to the data in this system.



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No.	Question	Response
21	How will user access to the data be determined?	Role-based security and access rights are implemented to protect the confidentiality of information. Role-based security includes the use of USDA eAuthentication services, which provides user authentication. User roles are granted through web-of-trust mechanisms in place. Criteria, procedures, controls, and responsibilities regarding access are documented in the ePermits Certification and Accreditation (C&A) documentation, the ePermits Security Plan, and Standard Operating Procedures (SOP).
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	How will user access to the data be restricted?	Each program approves access and roles in the system. User access to data is restricted and is based on the role of the user. Applicants see only data related to their own permit applications. APHIS permits staff view only information within their department. CBI is restricted to authorized users. Select agent permit data is restricted to authorized users.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## 2.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	Not applicable. This system does not interface with another system
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	Customers can contact the Freedom of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unite 50, Riverdale, MD 20737-1232
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	<input checked="" type="checkbox"/> Yes – If YES, go to question 27. <input type="checkbox"/> No



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No.	Question	Response
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: <ul style="list-style-type: none"> <li>▪ Consolidation and linkage of files and systems</li> <li>▪ Derivation of data</li> <li>▪ Accelerated information processing and decision making</li> <li>▪ Use of new technologies</li> </ul> Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	The system accepts all incoming applications for permits and are treated equally. Once received, applications are assigned to a specialist for processing. These assignments are made electronically. Thus, fair and equitable treatment are afforded to all applicants and customers who are requesting permits.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, go to question 30
29.1	Explain	

### 3 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data can be retrieved using either the applicant name or the applicant organization name provided by the applicant.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at <a href="http://www.access.GPO.gov">www.access.GPO.gov</a> .)	The APHIS-10 Systems of Records Notice is currently in draft form and will soon be submitted for clearance and approval.
30.3	If the system is being modified, will the SOR require amendment or revision?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



## 4 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	



## **5 Completion Instructions**

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

**1. Yes.**

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF  
INFORMATION OFFICE FOR CYBER SECURITY.



## Privacy Impact Assessment Authorization

### Memorandum

I have carefully assessed the Privacy Impact Assessment for the

\_\_\_\_\_  
(System Name)

This document has been completed in accordance with the requirements of the E-Government Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

\_\_\_\_\_  
System Manager/Owner  
OR Project Representative  
OR Program/Office Head.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency's Chief FOIA officer  
OR Senior Official for Privacy  
OR Designated privacy person

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency OCIO

\_\_\_\_\_  
Date