

Privacy Impact Assessment

Policy, E-Government and Fair Information Practices

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**Privacy Impact Assessment for the
National Center for Animal Health (NCAH)
Azure Platform (NAP): Warehouse Inventory
Management and Procurement System
(WIMPS)
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Abstract

The purpose of the NCAH on APHIS Platform (NAP) system security plan is to assess and authorize all of the National Centers for Animal Health (NCAH) mission capabilities residing on the Animal and Plant Health Inspection Service (APHIS) Enterprise Infrastructure (AEI) general support system (GSS). The NCAH is located in Ames, IA.

The Warehouse Inventory Management and Procurement System (WIMPS) is an enterprise-level electronic information management system managing two warehouses in Veterinary Services (VS). These warehouses store routine office supplies and consumables used by investigative, scientific and support staff conducting research, investigative activities, animal disease and biologic testing. The users of this system rely heavily on having a quick response when disease outbreaks are observed. This information system allows VS to:

- Receive packages
- Report costs
- Maintain and rotate inventory
- Shipping supplies for diagnostic testing of animal disease, animal health emergencies and routine livestock surveillance.
- Ship veterinary supplies necessary for animal health to stakeholders inside and external to USDA

This privacy impact assessment is being conducted to assess the storage of PII for stakeholders external to the USDA who contribute to the nationwide animal health programs.

Overview

The Warehouse Inventory Management and Procurement System (WIMPS) is an enterprise-level electronic information management system managing two warehouses in Veterinary Services (VS). These warehouses store routine office supplies and consumables used by investigative, scientific and support staff conducting research, investigative activities, animal disease and biologic testing. The users of this system rely heavily on having a quick response when disease outbreaks are observed.

Additionally, the facilities store routine office supplies and consumables.

The information system stores information necessary to identify items, identify the package recipient inside of USDA, and non-USDA employee ship-to information. Ship-to information is shared with contracted carriers to deliver vaccines and other animal health emergency supplies.

During a typical transaction, office or laboratory supplies are ordered from the supplier and received at the warehouse to be transferred to the final recipient. The

entire lifecycle is supported to ensure the paper and printer ink are received by the office worker, and that gloves, solvents and pipettes are received by the laboratory worker. The second typical transaction is when USDA identifies and ships to suitable recipients supplies for diagnostic testing of animal disease, animal health emergencies, and routine livestock surveillance. Recipients are both USDA and external to USDA. Ship-to information is share with contracted carriers to successfully deliver the USDA supplies.

WIMPS is operated under the authority of Homeland Security Presidential Directive 9 and Animal Health Protection Act.

WIMPS is a part of NCAH Azure Platform (NAP) and categorized as a “Moderate” system under Federal Information Processing Standard (FIPS) 199. The categorization for NAP is based on a review of the data’s confidentiality, integrity and availability impact via National Institute of Science and Technology (NIST) standard.

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?

This information system maintains the following information:

- Shipping Address
- Contact Name
- Contact Phone Number
- Contact e-mail
- Order Information
- Premises Identification Number
- USDA Employee Name
- USDA Phone Number
- USDA e-mail
- USDA Component, Agency, & Office
- Ship-to-USDA Address

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

The sources of information in the WIMPS include USDA employee, USDA supervisor, USDA active directory and USDA/APHIS District office directors.

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

The information is being maintained in WIMPS to ensure the successfully receipt and delivery of packages, and to track the funding for those packages shipping costs.

1.4 How is the information collected?

USDA employee information is collected from the supervisor, USDA active directory. Non-USDA ship-to information is collected from the APHIS District offices.

1.5 How will the information be checked for accuracy?

USDA information is validated by the supervisor and through periodic review of the USDA active directory. Non-USDA ship-to information is validated by the APHIS District offices.

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

Specific legal authorities for WIMPS include:

NVS was established under the authority of the Homeland Security Presidential Directive 9 (HSPD-9) which established the NVS in 2004.

CVB enforces the Virus-Serum –Toxin Act (21 USC §151-159 et.seq.)

NVSL provides testing under:

- 9 CFR 53 (Foot-And-Mouth Disease, Pleuropneumonia, Rinderpest, and Certain other communicable Diseases of Livestock or Poultry)
- 9 CFR 56 (Control of H5/H7 Low Pathogenic Avian Influenza)
- 9 CFR 82 (Exotic Newcastle Diseases and Chlamydiosis)
- 9 CFR 94 (Rinderpest, Foot-and-Mouth Disease, Exotic Newcastle Disease, African Swine Fever, Classical Swine Fever, Swine Vesicular Disease, and Bovine Spongiform Encephalopathy: prohibited and restricted importations)

Under the authority of the:

- Animal Health Protection Act (7 USC Chapter 109)
- Animal Welfare Act (7 USC 54)
- Homeland Security Presidential Directives (HSPD) 5 (Management of Domestic Incidents)
- HSPD 7 (Critical Infrastructure Identification, Prioritization, and Protection)
- HSPD 8 (National Preparedness)
- HSPD 9 (Defense of United States Agriculture and Food)
- HSPD 12 (Policies for a common Identification Standard for Federal Employees and Contractors)

NADC (ARS) as authority under:

- The Organic Act of 1862 (7 U.S.C. 2201 note)
- Agricultural Research Act of 1935 (7 U.S.C. 427)
- Research and Marketing Act of 1946 (Pub. L. 79-733), as amended (7 U.S.C. 427, 1621 note)
- Food and Agriculture Act of 1977 (Pub. L. 95- 113), as amended (7 U.S.C. 1281 note)
- Food Security Act of 1985 (Pub. L. 99-198) (7 U.S.C. 3101 note)
- Food, Agriculture, Conservation, and Trade Act of 1990 (Pub. L. 101-624) (7 U.S.C. 1421 note)
- Federal Agriculture Improvement and Reform Act of 1996 (Pub. L. 104-127)
- Agricultural Research, Extension, and Education Reform Act of 1998 (Pub. L. 105-185)

Farm Security and Rural Investment Act of 2002 (Pub.L. 107-171)

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

Unauthorized access to this data is the privacy risk. This is mitigated by using capabilities common to USDA and the commercial products used. This includes:

- System access control by USDA domain credentials
- User based role access
- Separation of duties
- Limiting web access
- Audit logging

User access is requested, reviewed, and documented on APHIS form 513, via the User Management System (UMS). User access is recertified annually. Access is limited to USDA employees, and contractor access is not provided.

Section 2.0 Uses of the Information

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

2.1 Describe all the uses of information.

National Centers for Animal Health (NCAH) on Azure Platform (NAP) is a moderate system under Federal Information Processing Standard (FIPS) 199 and contains the WIMPS application. The categorization for NAP is based on a review of the data's confidentiality, integrity and availability impact via NIST standard.

Information is used by APHIS VS to order, track, ship, and manage warehouse inventory distribution to both USDA and non-USDA customers.

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

Contained within the WIMPS, the Integrated Sales Analysis Tool (Business Intelligence module) integrates IBM Cognos to generate reports from the data contained in the system. Reporting consists of cost and logistical data for supplies of high-volume biologic testing. Other reports can be created to determine usage metrics for users, storage information, processing, historical order information, and inventory preparation based on previous needs.

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

The WIMPS does not use commercial or publicly available data.

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.

Privacy rights of the customer and employees will be protected by USDA APHIS VS.

- Access to the data in the system is controlled and documented by formal authorization
- All access to the system is limited by account identification and password
- Users have formal training in how to use the system and manage PII
- A warning banner must be acknowledged at login

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?

Electronic information is maintained for 10 years for NCAH and 7 years for NVS based on submitted record schedules. The data is archived at 5 years intervals.

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

No. Data retention periods have been submitted and awaiting final approval by NARA. WIMPS has a schedule submitted.

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

Risks associated with data retention are minimal and include the possibility of the data being accessed by unauthorized personnel. WIMPS uses role based access to mitigate this risk. The login interface reminds users of their responsibility every time they log in. In addition, given the length of time data is retained in the information system (WIMPS specifically), unauthorized access to this data is the privacy risk. This is mitigated by using capabilities common to USDA and the commercial products used. This includes:

- System access control by USDA domain credentials
- User based role access
- Separation of duties
- Limiting web access
- Audit logging

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?

No information is shared internally. NCAH is a joint APHIS and ARS location. The system is used by APHIS and ARS to conduct business at NCAH for the creation and tracking of shipments. NCAH ARS and APHIS employees have access and access controls are in place. Data is not shared outside of NCAH between APHIS and ARS.

4.2 How is the information transmitted or disclosed?

No data is transmitted or disclosed internally via the system. Data is used to create printing labels for the purposes of shipping.

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.

Privacy rights of the WIMPS customer and employees will be protected by USDA APHIS VS management. Target systems also have security controls to address access to and security of information.

- Access to the data in the systems (WIMPS and USDA email) is controlled and documented by formal authorization
- All access to the system is limited by account identification and eAuthentication. The eAuthentication makes uses of Personal Identification Verification (PIV) cards using associated certificates.
- Users have formal training in how to use the system

A warning banner must be acknowledged at login

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?

Information is shared with contracted carriers. Name, address, and phone number is shared. This information is shared for package delivery to the ship-to address.

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.

The sharing of information is compatible with the reason it was collected. Animal owners and others share this information to receive no-cost animal disease and biologic testing material. These animal owners and others rely heavily on having a quick response when disease outbreaks are observed.

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

The information is printed on the outside of each box. The information is transmitted to contracted carriers when the package pick-up is requested.

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

The information is printed on the outside of each box. The information is transmitted to the contracted carrier when the package pick-up is requested. This shared information

must be provided to successfully deliver the animal disease and biologic testing material. This cannot be mitigated.

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.

Based on the data usage a SORN is not required for this system. WIMPS focuses on the shipment and contents, not the PII used for the shipping address.

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

Yes. The PIA is posted on the USDA and APHIS privacy websites.

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

No. If individuals do not provide the information then they will not receive the supplies requested.

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

No. If individuals do not provide the information then they will not receive the supplies requested.

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.

Notice is published on the USDA and APHIS Privacy websites. All data collected is for shipping purposes.

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?

Any individual may obtain information from a record in the system that pertains to him or her. All inquiries should be addressed in one of the following manners:

VIA MAIL:

USDA – Animal and Plant Health Inspection Service
Tonya Woods, FOIA/PA Director
4700 River Road, Unit 50
Riverdale, MD 20737

VIA FACSIMILE: 301-734-5941

VIA E-MAIL: APHISPRIVACY@usda.gov

VIA Web Request Form: Located at the following link
<https://efoia-pal.usda.gov/App/Home.aspx>

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

Persons listed as the ship-to address can correct their information any time through the USDA District Office.

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

Persons listed as the ship-to address are typically in contact with USDA throughout the entire disease outbreak. Persons listed as the ship-to address can contact the USDA district office at any time to address shipping concerns or correct their information.

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

A formal process is available to correct any data inaccuracies. See section 7.3 for more information.

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

APHIS has a formal redress procedure in place and there is minimum risk.

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?

At NCAH, user access is initiated by an USDA employee's supervisor request, is approved by the system owner in NVSL, or the NVS Logistics Chief, and is recorded on APHIS form 513. Ordering clerks at district offices must first have an eAuthorization account prior to requesting access for placing orders.

8.2 Will Department contractors have access to the system?

No contractors have access.

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

Currently, all individuals provided access to WIMPS are required to complete annual Information Technology (IT) Security Awareness Training, Privacy training and must sign APHIS Rules of Behavior form prior to receiving access to the information system. The standard USDA warning banner must also be acknowledged and accepted before logging in to the system.

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

Yes. The NAP system established an Authority to Operate (ATO) on May 11, 2020 and is categorized as a "Moderate" system under FIPS 199. The categorization for NAP is based on a review of the data's confidentiality, integrity and availability impact via NIST standard. The system re-accreditation is set to renew the ATO in May 2023.

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

USDA Active Directory (AD) provides authentication and identity services for this information system. All users must have active AD accounts, and AD provides a technical safeguard to WIMPS. This information system includes an Oracle database for data storage as well as auditing. All objects in the information system are audited, normal and privileged user actions are audit, and all audit logs written to the database are analyzed and archived.

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

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

All the information stored in this information system is available outside of this information system. The integrity of the data is protected to ensure all transaction are complete and all items shipped successfully. All data objects, transactions, and ship-to data are protected by the available USDA technology and services (Oracle and Active Directory). Audit logs are available for all transactions.

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?

WIMPS is a supply chain solution COTS provided by Tecsys software.

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

N/A –WIMPS 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”?

The ISSPM and system owner have reviewed the OMB memorandums listed above.

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

Not Applicable.

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

Not Applicable.

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

Not Applicable.

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?

Not Applicable.

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

Not Applicable.

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

Not Applicable.

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?

Not Applicable.

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)?

Not Applicable.

10.10 Does the system use web measurement and customization technology?

Not Applicable.

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?

Not Applicable.

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.

Not Applicable.



Approval Signature

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