

# **Privacy Impact Assessment Surveillance Collaboration Services (SCS)**

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(SCS)



# Privacy Impact Assessment for the Surveillance Collaboration Services (SCS)

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## Abstract

- This Privacy Impact Assessment (PIA) is for the USDA, Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), Surveillance Collaboration Services (SCS).
- USDA APHIS VS SCS is an enterprise-level (business-wide) animal health and surveillance electronic information management system. It provides an electronic means of data input, data transmission, data storage, and data reporting. This system enables USDA APHIS to take a comprehensive and integrated approach to collecting and managing animal health data for disease management and surveillance programs.
- This PIA was conducted as part of the annual assessment documents update.

## Overview

The USDA APHIS VS SCS is an animal health and surveillance system which provides enterprise-level surveillance and animal health program data for numerous species and diseases to facilitate the detection, management, prevention, investigation, control and eradication of animal diseases.

The USDA APHIS VS SCS maintains test and/or vaccination data and other program information such as disease or certification status for flocks/herds subject to or involved with USDA APHIS VS animal disease/pest surveillance and or control programs such as: Viral Hemorrhagic Septicemia, Johnes, Brucellosis, Tuberculosis, Chronic Wasting Disease, Pseudorabies, and Avian Influenza. Included in this functional data is privacy related data such as USDA and State employee name, address, and phone information for employees directly involved in the above mentioned program activities. The USDA APHIS VS SCS supports the Veterinary Services mission to protect and improve the health, quality, and marketability of our nation's animals by providing a nationwide repository of animal health and productivity information.

USDA APHIS VS SCS also maintains name, address, and phone information for individuals identified as contacts for premises (locations) and owners of animals or animal related operations involved with the various programs. Because of the variable nature of the premises, including sole proprietorships, and the undocumented relationship of the contact to the premises, many of the contacts are simply private citizens.



The USDA APHIS VS SCS is funded by Congress through appropriated funds for the Animal Health Technical Services budget line item. The system received a renewal of its Authority to Operate (ATO) in April 2015. SCS has a security categorization of “Moderate”.

## 1 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 1What information is collected, used, disseminated, or maintained in the system?

<b>Information/Record Type</b>	<b>Component Data (Examples)</b>
Premises	Physical location of a business or animal herd/flock
Premises Supplemental Detail	Commercial operation records to provide additional details about the business, such as type of operation, type, of livestock, and whether or not they are approved to receive international livestock.
Events	Events are activities such as tissue collections, vaccinations, inspections, or inventories.
Surveillance	Test submission information and test results for diseases such as Johnes, Brucellosis, Tuberculosis, Chronic Wasting Disease, Pseudorabies, Swine Influenza Virus, Scrapie or Avian Influenza.
Animal	Animal species, breed, sex, age, classification, and any associated individual or group identifiers.
Other	Specific ad-hoc data, miscellaneous identification numbers such as: the regulatory official ID and/or the Veterinary Accreditation number of the animal health official. It also includes information about the medicine or vaccine name, the manufacturer, and medicine license code.
Status	Temporary conditions or groups that a herd may be part of or subject to, such as quarantined, infected, certified free, or scheduled for future testing.



Information/Record Type	Component Data (Examples)
Aggregated	Instance of surveillance and program data that allows state-wide aggregation of data by species, disease, premises type, herd status and/or location (state, county, zip code).

Concerning the privacy related information there are two types collected in the USDA APHIS VS SCS:

- Employee – USDA APHIS VS SCS maintains name, address, phone and personal identification number (professional license number, Veterinary Accreditation number, regulatory official ID) information for USDA and State animal health employees directly involved in disease program activities.
- Other – USDA APHIS VS SCS maintains name, address, and phone information for individuals identified as contacts for premises (locations) and owners of animals or animal related operations involved with the various animal disease/pest surveillance and or control programs that could be identified in agency assigned miscellaneous numbers (case numbers, flock IDs, permits, etc.) and personal identification number (professional license number, Veterinary Accreditation number) information for private veterinarians. Because of the varying nature of the premises, including sole proprietorships, and the undocumented relationship of the contact to the premises, many of the contacts are simply private citizens deserving of protection under the Privacy Act.

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

There are three sources of information for the USDA APHIS VS SCS: Federal, State/Local Government and third-party. Information in this system comes primarily from the users and individuals and/or businesses in the general public involved in or supporting the production, management or holding of livestock. In addition, the USDA Food Safety Inspection Service (FSIS), Farm Services Agency (FSA), and APHIS (Veterinary Services and Wildlife Services), will provide data to the system. The USDA National Agriculture Statistics Service (NASS) currently provide animal and farm population Census data aggregated at the county level for spatial display.

The individual State Veterinarian Offices, as well as multiple state and university animal diagnostics and genotyping testing laboratories will provide data for use in the USDA APHIS VS SCS system.

Third party sources of information may include the American Veterinary Medical Association (AVMA), National Turkey Federation (NTF), and private genotype testing laboratories,



private individuals and companies who are the subject of the programs for whom we keep data and third party data suppliers.

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

The purpose of the Surveillance Collaboration Services system is to allow animal health officials to effectively manage animal disease, pest and surveillance programs including providing:

- a. rapid detection and effective response to animal disease and animal pest events in the United States thereby reducing the spread of infections to new flocks/herds;
- b. epidemiological analysis, including animal tracing, diagnostic testing, surveillance activities, and other factors of epidemiologic importance for evaluating disease risk;
- c. notification of owners or buyers of potentially exposed or infected livestock and State and Federal regulatory officials, including notification through a public web site when records are inadequate to trace such animals to a specific owner or premises;
- d. documentation of U.S. animal health program expenditures, statistical data and accomplishments that support national animal disease control programs and international trade agreements;
- e. documentation of compliance with and provisions for a public listing of participants in voluntary certification or quality assurance programs; and
- f. provide a public listing of approved or qualifying facilities such as approved livestock markets.

Summarized animal disease information is reported to the (OIE) Office International des Epizooties (World Organization for Animal Health). Some animal disease information is shared with world trading partners provided for risk analysis to demonstrate that US agricultural animal products are safe for export to other countries. Most risk analysis information is aggregated information and does not describe detailed record information.

Some animal disease information is shared with state and federal wildlife agencies, as animal disease frequently crossover between domesticated animals and wildlife.

Some animal disease information is shared with state and federal public health agencies, as animal disease can crossover between domesticated animals and humans.

All information for a State, by definition, is shared with state animal health officials and state animal health databases for that State. State employees who are authenticated users have access to all the data collected about animals in their state. Federal users have access to data to



meet the mission of Veterinary Services. State partners use the information to manage animal diseases in their state.

#### **1.4 How is the information collected?**

The information collected from states, users, individuals and/or businesses in the general public is collected on OMB approved- forms or directly as referenced in Information Collections numbers 0579-0047, 0579-0146, 0579-0212, 0579-0007 and 0579-0101. As these packages come up for renewal appropriate screen shots will be included. In some cases, the information is entered directly into the USDA APHIS VS Surveillance Collaboration Services (SCS) application by animal lab employees who are entering results from their internal lab documents or a state or federal employee entering information provided over the phone, in an email, or letter by a producer typically in order to fulfill a request for a flock ID or ear tags. Members of the public do not access system to enter data themselves. Data is input by authenticated state and federal employees.

#### **1.5 How will the information be checked for accuracy?**

Data collected from customers is verified for accuracy, relevance, timeliness and completeness by USDA and state employees. These employees are responsible for the review and accuracy of the data. Verification of data records occurs on an as-needed basis. Also, there are limited systematic data entry constraints to ensure entry completeness.

Data collected from USDA sources is verified for accuracy, relevance, timeliness and completeness by USDA and state employees. These employees are responsible for the review and accuracy of the data. Verification of data records occurs on an as-needed basis. Also, there are limited systematic data entry constraints to ensure entry completeness.

Data collected from non-USDA sources will be verified for accuracy, relevance, timeliness and completeness by USDA Veterinary Services employees, state employees and or other federal employees. These employees are responsible for the review and accuracy of the data. Data verification occurs on an as-needed basis. Also, there are limited systematic data entry constraints to ensure entry completeness.

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

- The Animal Damage Control Act of 1931, 7 U.S.C. 8301 et seq. of the Animal Health Protection Act
- The Animal Health Protection Act, 7 U. S. C. 8301-8317
- 7 USC Sec. 7629
- The Farm Security and Rural Investment Act of 2002



- Public Health Security and Bioterrorism Preparedness and Response Act of 2002  
116 Stat 674-678
- The Homeland Security Presidential Directive 9.

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

Unauthorized disclosure of employee and other personal data, as identified in Section 1.1 above, was the primary privacy risk identified in the PTA. USDA APHIS, including the VS Executive Team, District and Commodity Directors, Assistant District Directors, Centers for Epidemiology and Animal Health (CEAH), Surveillance Design and Analysis (SDA) and State Veterinarians are all responsible for protecting the privacy rights of the employees and other persons identified in the SCS as required by applicable State and Federal laws. Specific mitigation activities are:

- All access to the data in the system is controlled by formal authorization. Each individual's supervisor must identify (authorize) what functional roles that individual needs in the USDA APHIS VS SCS system.
- Access to USDA APHIS VS SCS is controlled by the USDA eAuthentication system and/or APHIS VPN.
- The application limits access to relevant information and prevents access to unauthorized information.
- All 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.

## **2 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.**

The data is used for routine animal health surveillance, management of domestic animal disease and pest control programs, and to monitor for and respond to the introduction of foreign animal diseases.



State Veterinarians and State Animal Health officials, as co-owners of the data, have the discretion to share information stored in the USDA APHIS VS SCS relevant to premises or persons within their state in accordance with state laws and regulations via public web sites and/or may store such information in animal health and surveillance management databases developed by State IT developers, contractors or other third party software vendors in a manner that provides secure data access.

Certain disease information reported by State and/or Federal employees is recorded in USDA APHIS VS SCS. These reports are then summarized by APHIS in reports to the (OIE) Office International des Epizooties (World Organization for Animal Health). No 'customer', 'employee' or 'other' classifications of private information is published or distributed to OIE.

The Surveillance Design and Analysis (SDA) and the Commodity Health Centers have agency responsibility for reporting surveillance and program management activities on a nationwide basis. The SDA and the Commodity Health Centers will have direct access to the USDA APHIS VS SCS and provide and publish summarized data to the public and our trading partners.

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

USDA APHIS VS SCS uses the IBM® Enterprise Cognos® reporting tool to analyze data. Data is also analyzed in Excel spreadsheets and by using SAS® (a statistical application). 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 USDA APHIS VS SCS.

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

USDA APHIS VS SCS uses Google Mapping data and USDA National Agriculture Statistics Service (NASS) animal and farm population Census data aggregated at the county level for spatial display. This data allows APHIS to see how much surveillance has been completed by Veterinary Services versus how many animals are reported to live in a particular county.



## **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 employees and other persons will be protected by USDA APHIS VS management within the limits of the Privacy Act of 1974. USDA APHIS VS SCS has security controls to address access/security of information.
- All access to the data in the system is controlled by formal authorization. Each individual's supervisor must identify (authorize) what functional roles that individual needs in the USDA APHIS VS SCS application.
- All requests for access to the system are verified by user identification and authentication. Users must have a government issued login and password that is controlled and managed either at the Veterinary Services, National, District or local offices or in the case of local State databases the State Veterinarian's office.
- The USDA APHIS VS SCS application limits access to relevant information and prevents access to unauthorized information through role-based access.
- Detailed reports with personally identifiable information will be marked with an appropriate sensitivity classification.
- All users receive security basics training and are required to sign rules of behavior before being given access to the system. Additionally, all users receive security basics refresher training and sign rules of behavior on an annual basis.
- At the application login screen the warning banner must be acknowledged before users are allowed to log into the application.

## **3 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 records within the USDA APHIS VS SCS application are considered permanent until the actual records retention scheduled is approved by NARA. Individual electronic records are retained within the system for 50 years from the last date of creation, edit, or access of those individual records or their child records. The location of an animal disease infection is of importance to APHIS for epidemiological analysis such as determining the effect of climate or other changes on disease patterns. Further, TSE studies have shown that the agent may remain infective in the environment for up to 16 years after outbreak and possibly longer. Incremental and full system tape backups are retained for 1 month. USDA National Information Technology Center retains 1 full month backup for one year.



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

This is in progress. USDA APHIS VS SCS is taking necessary action to ensure that the MRP 400 is completed and submitted to NARA.

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

Unauthorized disclosure of employee and other personal data, as identified in Section 1.1 above, is the primary privacy risk, as identified by the PTA. The benefit of having that data available for premises backtracking and other trending information during an emergency overrides any risk due to data retention timescale. To date, all records have been retained as VS awaits NARA disposition and retention scheduling. To mitigate this risk, authorization access is strictly monitored and all external data sharing requires approval of the APHIS Chief Information Security Officer. Personally Identifiable Information (PII) is limited to names, addresses, email and phone numbers of submitters. USDA APHIS VS SCS maintains information in a secure manner and disposes of information per APHIS Directive 3440.2.

## **4 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?**

All data is available (for the areas/states for which they have responsibility) to USDA APHIS, including District and Commodity Directors, Assistant District Directors, district and national staff, Centers for Epidemiology and Animal Health (CEAH), Surveillance Design and Analysis (SDA) and State Veterinarians, and their field personnel, for program implementation, oversight, and reporting.

National Import Export Services (NIES) gets summary data to assist in trade negotiations.



## **4.2 How is the information transmitted or disclosed?**

The APHIS and state users have access to the USDA APHIS VS SCS through the APHIS Enterprise Infrastructure (AEI) and National Information Technology Center (NITC) General Support System (GSS) and can extract detailed or summary reports that are pertinent to their organizations.

## **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 employee and other personal information, as identified in Section 1.1 above, is the primary privacy risk to information shared internally to APHIS. These risks are mitigated through USDA APHIS VS SCS and AEI & NITC GSS security controls as delineated in the current USDA APHIS VS SCS System Security Plan. Further, the animal health professionals who have access to the data are trained in the proper use and dissemination of this data. All access must be approved, before it is granted. VS, where feasible and within the technical limitations, ensures activities within the SCS are audited, PII is used only for authorized purposes and in a manner that is compatible with Privacy Act, and PII use is minimized to the extent necessary to meet the mission needs of the VS surveillance program.

# **5 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?**

- USDA APHIS VS SCS shares data with cooperating universities and researchers, other Federal agencies (Health and Human Services, Center for Disease Control, and Department of Homeland Security). However, no direct access to the data in USDA APHIS VS SCS is provided to these external organizations. USDA APHIS VS staff pulls data as needed.
- Federal and State animal health officials use the information to monitor the status of an animal disease investigation, document actions taken relating to an animal



disease investigation, track the status of animals susceptible to foreign animal diseases, and assist with managing and analyzing animal disease and surveillance programs.

- Federal and State wildlife agencies use the information to assist in managing and analyzing disease programs and monitoring diseases related to wildlife, feral or alternative livestock.
- Federal or State agencies involved with public health such as the Departments of Homeland Security and Health and Human Services use the information for the purposes of zoonotic disease surveillance or control activities.
- Other appropriate agencies, whether Federal, State, local, or foreign, used the information to assist 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.
- Department of Justice may use the information when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the Department of Justice has agreed to represent the employee, or the United States, in litigation, where the agency determines that litigation is likely to affect the agency or any of its components, 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.
- For use in a proceeding before a court or adjudicative body before which the agency is authorized to appear, when the agency, or any component thereof, or any employee of the agency in his or her official capacity, or any employee of the agency in his or her individual capacity where the agency has agreed to represent the employee, or the United States, where the agency determines that litigation is likely to affect the agency or any of its components, 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;



- To appropriate agencies, entities, and persons when the agency suspects or has confirmed that the security or confidentiality of information in the system of records has been compromised; 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 the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the agency's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm;
- 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. This routine use assists the agency in carrying out the program, and thus is compatible with the purpose for which the records are created and maintained;
- To USDA contractors, partner agency employees or contractors, or private industry employed to identify patterns, trends or anomalies indicative of fraud, waste, or abuse; and
- 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.

**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.**

Where the USDA controls the personally identifiable information in the SCS; use of that information will be governed by an appropriate routine use in APHIS-15 Animal Health and Surveillance Management (AHSM) SOR Notice. Where the SCS information is controlled by State authorities, the legal mechanisms employed are per state information security law and regulation. 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?**

State Animal Health users have access within the USDA APHIS VS SCS to all data for the state in which they reside. This is compatible with the original collection and the published SORN.

For any information sent in an external report, the privacy information is redacted. When the external recipient is under contract with USDA Non-Disclosure Agreements are used to prevent unauthorized information transfer. When the external recipient is a university or research partner, the information is transmitted via a secured web service component.

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

Unauthorized disclosure of employee and other personal information, as identified in Section 1.1 above, is the primary privacy risk to information shared externally to the USDA. This risk has been mitigated for USDA initiated sharing through technical and procedural information security controls levied on external holders and through the use of NDAs, ISAs, MOUs and other agreements. The data access of state users is restricted to users within their state. Data is shared only for the authorized purposes identified in the Privacy Act. VS technical staff receives training on the handling and management of personally identifiable information. All proposed new instances of sharing PII with external parties, must be reviewed/approved by VS Executive Leadership, the VS Authorizing Official and APHIS Information Security Branch.

## **6 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 Was notice provided to the individual prior to collection of information?**

Information is collected on approved OMB-approved forms.

A System of Record Notice (APHIS -15) was published in the Federal Register in January 2012.



## **6.2 Do individuals have the opportunity and/or right to decline to provide information?**

Individuals must provide certain information in order to receive animal health services from the APHIS. There is no law requiring individuals to provide information, unless they are requesting a service or product from APHIS. Further, individuals involved in animal disease investigations are required to provide information as governed by specific animal health laws and regulations of the state in which they reside.

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

No. The data are treated uniformly for all submitters. Once the information is submitted it is subject to all routine uses.

## **6.4 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. No information is collected without an individual's awareness. At the time of data collection, a form is being completed or the individual is speaking with a Federal or State employee. Information pertains to health status and location of an individual's animals.

# **7 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. Requests for hard copies of records should be in writing, and the request must contain the requesting individual's name, address, name of the system of records, timeframe for the records in question, any other pertinent information to help identify the file, and a copy of his/her photo identification containing a current address for verification of identification. All inquiries should be addressed to the Freedom of Information and Privacy Act Staff,



Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232.

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

Inaccurate data are corrected by submitting requests to USDA APHIS Veterinary Services employees, state employees and or other federal employees and approval of the program manager is required in order for corrections to be made.

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

Individuals are notified of procedures by the animal health officials at the point of data collection.

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

Any individual may contest information contained within a record in the system that pertains to him/her by submitting a written request to the system manager to the Freedom of Information and Privacy Act Staff, Legislative and Public Affairs, APHIS, 4700 River Road Unit 50, Riverdale, MD 20737-1232. Include the reason for contesting the record and the proposed amendment to the information with supporting documentation to show how the record is inaccurate.

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

The primary risk associated with the redress process is that the request will be ignored or delayed by the Program or IT staff. If the written request is delivered to the address as stated in Section 7.4, and then requested by the APHIS Privacy Office, VS is mandated to comply with Privacy requirements. VS makes every attempt to act on requests by conducting rapid reviews of the request, and coordinating a response with the Privacy Office to ensure that requested timeframes are met.

## **8 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 USDA APHIS VS SCS is based on the need to conduct business with USDA and is approved by an authorized APHIS VS official. Criteria, procedures, and controls are documented. Access must be requested in writing and approved by the supervisor or APHIS authorizing official.

Once access is authorized, users of USDA APHIS VS SCS information are further controlled through electronic role-based access. The system is integrated with USDA eAuthentication application and requires level 2 authenticated access. Users must have a government issued login and password that is controlled and managed either at the Veterinary Services district or local VS offices or in the case of local State databases the State Veterinarian's office. Password controls, procedures, responsibilities and policies follow USDA departmental standards.

## **8.2 Will Department contractors have access to the system?**

VS IT contractors are provided access only as needed to perform the requirements of a given contract. Contractors are involved in the design and development of the USDA APHIS VS SCS. Privacy clauses are included in the associated contracts. Contractors provide 3rd tier production support for the application. Contractors are required to pass the USDA Annual Security Basics training, and sign a Rules of Behavior agreement.

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

All APHIS employees provided access to the USDA APHIS VS SCS application are required to complete annual Information Technology (IT) Security Awareness Training and must sign APHIS Rules of Behavior form prior to receiving access to the information system. VS system owners and technical staff are required to complete PII Lite training each year.

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

The USDA APHIS VS SCS received Authority to Operate (ATO) on May 12, 2015 by completing an Assessment and Authorization. The ATO for this system will be renewed on or before April 29, 2018.



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

Formal auditing measures for the USDA APHIS VS SCS will include security assessments performed by USDA APHIS at least annually and independent security assessments performed in support of Certification and Accreditation efforts. The independent assessments will be performed per the timeframe of USDA APHIS VS SCS Re-certification.

As to technical safeguards:

- The USDA APHIS VS SCS is continuously monitored in several different ways. NITC performs a scan of systems every thirty days to identify possible threats. This is conducted through the NITC/VS Reimbursable Agreement and results provided to the VS DIT Technology staff. The vulnerabilities identified are required to be remediated by the responsible parties.
- Security related incidents are reported to the ISSM and requires an investigation. APHIS Cyber Incident Response Team (ACIRT) and USDA Agriculture Security Operations Center (ASOC) work together to respond and handle all incidents.
- Operational technical safeguards to prevent data misuse begin with access control. Access to USDA APHIS VS SCS information is protected by role-based access which is managed by the network firewall, eAuthentication, and the USDA APHIS VS SCS application. Users must have a government issued login and password that is controlled and managed either at the Veterinary Services DIT or Area offices. Password controls, procedures, responsibilities and policies follow USDA departmental standards. At most sites, responsibility and scope of data access is defined by users' job descriptions. Policy dictates that a user may not 'self-nominate' themselves for access. Requests for access must come from their supervisor or other authorized animal health official.

## **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?**

Unauthorized disclosure of employee and other personnel information, as identified in Section 1.1 above, is the primary privacy risk to information shared both internally and externally to the USDA. This risk is mitigated through technical and procedural information security controls levied on internal and external holders of USDA APHIS VS SCS data. USDA



APHIS VS SCS and NITC GSS technical security controls are delineated in the current USDA APHIS VS SCS System Security Plan.

## **9 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 USDA APHIS VS Surveillance Collaboration Services (SCS) is a major application (MA) that collects, manages, and evaluates animal health data for disease management and surveillance programs.

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

This application does not employ technology which may raise privacy concerns.

## **10 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”?**

OMB M-10-23 has been distributed by APHIS VS.

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

Not applicable. USDA APHIS VS SCS does not use third party websites or applications.



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

Not applicable. USDA APHIS VS SCS does not use 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?**

Not applicable. USDA APHIS VS SCS does not use third party websites or applications.

**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. USDA APHIS VS SCS does not use third party websites or applications.

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

Not applicable. USDA APHIS VS SCS does not use third party websites or applications.

**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. USDA APHIS VS SCS does not use third party websites or applications.

**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. USDA APHIS VS SCS does not use third party websites or applications.



**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. USDA APHIS VS SCS does not use third party websites or applications.

**10.10 Does the system use web measurement and customization technology?**

Not applicable. USDA APHIS VS SCS does not use third party websites or applications.

If so, is the system and procedures reviewed annually to demonstrate compliance to OMB M-10-23?

Not applicable. USDA APHIS VS SCS does not use third party websites or applications.

**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?**

No, 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.**

This application does not employ technology which may raise privacy concerns.

**Responsible and Authorizing Officials**

Brian J. McCluskey

System Owner

United States Department of Agriculture

Approval Signature



Brian J. McCluskey

System Owner

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