

Privacy Impact Assessment VSISM

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USDA APHIS VS Veterinary Services
Integrated Surveillance Modules (VSISM)



Privacy Impact Assessment for the Veterinary Service Integrated Surveillance Modules (VSISM)

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Abstract

- This Privacy Impact Assessment (PIA) is for the USDA, Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), Veterinary Services Integrated Surveillance Modules (VSISM).
- USDA APHIS VSISM 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 initial Assessment and Authorization (A & A).

Overview

The USDA APHIS VSISM 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 VSISM maintains three types of data depending on the stream and condition of interest:

- Syndromic Observations
 - Lab Submission Test Orders and Results
 - Compliance Observations
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- Syndromic Observations

These are qualitative observations about a given animal grouped by important clinical subdivisions of the animal such as the nervous system, cardiovascular or musculoskeletal. This data is not characteristic of a disease, but of an animal. It can be used to assess the probability of a given disease and thus inform testing requests and epidemiological surveys. Currently some submissions capture clinical signs, but it is in reference to a specific disease, and there is no cross program standard.

- Lab Submission Test Orders and Results



These include the recording of laboratory test results and interpretations for specimens submitted to a diagnostic lab. These results and interpretations are specific to a condition, unlike the recording of syndromic observations which may be related to more than one condition. Test results represent a quantitative determination of a given disease incidence in an animal determined through testing of specimens taken from the animal. The results are used to support specimen or animal level interpretations which have direct surveillance consequences.

- Compliance Observations

This third category is comprised of observations of the operating parameters of a facility engaged in specific production practices characterized by discrete quantitative or semi-quantitative parameters. For example, a waste feeder facility may require the temperature of the cooker to be within a certain range, or a herd or flock certification program may have requirements in place regarding fencing, allowed feed, etc. In general this data will be characteristic of either the premises or the animal group as a whole, not of individual animals.

The USDA APHIS VSISM 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 VSISM 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 private citizens.

The USDA APHIS VSISM is funded by Congress through appropriated funds from Veterinary Services. This is a new system that is following the Authorization and Accreditation process to receive an Authority to Operate (ATO) in 2018. VSISM 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 What information is collected, used, disseminated, or maintained in the system?



Information/Record Type	Component Data (Examples)
Premises	Physical location of business or animal herd/flock
Observations	Includes observations about the location, subjects, and sample collected
Surveillance	Test submission information and test results for diseases such as Classical Swine Fever, Swine Brucellosis, Pseudorabies, or Foot and Mouth Disease
Subject	Subject 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, animal observations at the collection site, compliance observations, and licensing information for persons and locations
Lab	Testing Laboratory
Data Collection Stream	Method or means by which the data is being collected, such as On-Farm Slaughter, Slaughter Marker, or Diagnostic Lab
Commodity Group	Overall surveillance program such as Swine Health
Person Information	Name, contact information for collector, submitter, owner, designated epidemiologist
Test Results	Laboratory and field testing results and interpretation

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

There are two sources of information for the USDA APHIS VSISM:

- Collection information from visits to production facilities, slaughter plants, or other locations



- Laboratory results from diagnostic laboratories both in NAHLN and private laboratories

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

The purpose of the USDA APHIS VSISM 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;

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 form VS 10-4. In some cases, the information is entered directly into the USDA APHIS VSISM application by animal lab employees who are entering results from their internal lab documents or a state or federal employee entering information provided in person, over the phone, in an email, or letter by a producer. 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, USDA sources and non-USDA sources are verified for accuracy, relevance, timeliness and completeness by USDA and state employees at the time the data is collected. These employees are responsible for the review and accuracy of the data. Verification of data records occurs on an as-needed basis. Person address information only provides value during the lifecycle of the laboratory testing process and is not validated beyond the time of collection. 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.
- Farm Bill as approved by Congress

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 VSISM 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 VSISM system.
- Access to USDA APHIS VSISM 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 VSISM 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 VSISM. 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' private information is published or distributed to OIE.

The Center for Epidemiology for Animal Health (CEAH) and the Commodity Health Centers have agency responsibility for reporting surveillance and program management activities on a nationwide basis. The CEAH and the Commodity Health Centers will have direct access to the USDA APHIS VSISM 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 VSISM uses business analysis tools such as Alteryx and Tableau. Data is also analyzed in Excel spreadsheets and by using SAS® (a statistical application). Aggregated data is used to produce summary reports for stakeholders.

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

USDA APHIS VSISM 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 employees and other persons will be protected by USDA APHIS VS management within the limits of the Privacy Act of 1974. USDA APHIS VSISM 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 VSISM 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 VSISM application limits access to relevant information and prevents access to unauthorized information through role-based access.
- 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 VSISM application are considered permanent until the actual records retention scheduled is approved by NARA.

The proposed schedule will be as follows: Individual electronic records will be retained within the system for 150 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, studies have shown that disease agents may remain in the environment for years after initial occurrence.

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 VSISM 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 contact information, as identified in Section 1.1 above, is the primary privacy risk, as identified by the PTA. Personally Identifiable Information (PII) is limited to names, addresses, email and phone numbers of submitters/collectors and premises/animal owners.

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. All records will be retained as VS awaits NARA disposition and retention scheduling. USDA APHIS VSISM maintains information in a secure manner and will dispose of information per APHIS Directive 3440.2 and approval NARA disposition authority.

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), for program implementation, oversight, and reporting.

4.2 How is the information transmitted or disclosed?

The APHIS and state users have access to the USDA APHIS VSISM through the APHIS Enterprise Infrastructure (AEI) and National Information Technology Center (NITC) General Support System (GSS) via Tableau and Alteryx tools for reporting or direct database access controlled through database roles.

4.3 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 contact 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 VSISM and AEI & NITC GSS security controls as delineated in the current USDA APHIS VSISM 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 VSISM 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 VSISM 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 VSISM 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 VSISM; use of that information will be governed by an appropriate routine use in APHIS-15 Animal Health and Surveillance Management (AHSM) SOR Notice. The APHIS-15 SORN is currently under review and will be updated accordingly.

Where the VSISM 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?

When, the functionality is implemented to share information it will be shared on a case-by-case basis and there will be situations when it will be shared in bulk using the approved reporting and analysis tools. The information will be transmitted electronically in report format. If system owner approves system to system external interconnection, this connection will be made in a secure manner, conducted per routine uses outlined in the related System of Record Notice (SORN), and documented with an Interconnection Security Agreement (ISA) with the external sharing partner.

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

When, the functionality is implemented to share information it will be in accord with the stated purpose and use of the collection. Safeguards, such as, security and privacy training for organizational personnel will be required. Governance and technical procedures will restrict data access to only those allowed by the user. Finally, all requests for the sharing of PII must be reviewed/approved by the VS Executive Leadership, the System Owner, the VS Authorizing Officer and the 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?

The SORN is the official notice.

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.

Also, 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 use of the information will be noted in the routine uses of the SORN.

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?

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 at the address above. Include the reason for contesting the record and the proposed amendment to the information with supporting documentation to show how the record is inaccurate.

7.3 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?

There is a formal redress process in place. Please see

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 latency in making the correction. This risk is mitigated by empowering surveillance business representatives to address the update without IT intervention.

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 VSISM 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 VSISM 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. Password controls, procedures, responsibilities and policies follow USDA departmental standards.

8.2 Will Department contractors have access to the system?

Currently there are no VS IT contractors accessing this system.

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 VSISM 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 Protecting PII training each year.

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

The USDA APHIS VSISM is a new system and is following the requirements to receive an Authority to Operate (ATO).

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

In accordance with FIP 199/200 Moderate Baseline Security Controls. Some of the technical safeguards for VSISM using Dynamics CRM is a security model that includes auditing, role-based views, field-level security, and division of security. This means any events, such as



create, modified, soft deletion, users, old and new values are audited at the field level. Even the audit history on individual record and/or audit history summary is also tightly controlled with separate security settings to protect the integrity of the log. The security model only provides users with access only to the appropriate levels of information based on their role(s). Furthermore, views and field-level are role-based as well; preventing users from seeing, accessing, and/or making changes to individual fields or records they do not have access to. Finally, access control is a combination of eAuthentication (user credential and authentication) and authorization (VSISM roles).

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

VSISM can only be accessed by personnel who have logged in with their e-Authentication PIV or e-authentication username/password credential and have been authorized with specific VSISM role(s). If data is retrieved, no record of data queried is kept but individual must have user access and rights to access data. Users must be authenticated and have role based access to data which is limited to a need to know basis to the users business unit and teams (Both state level access and commodity group).

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 Veterinary Services Integrated Surveillance Modules (VSISM) is a major application (MA) that collects, manages, and evaluates animal health data for disease management and surveillance programs.



9.2 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 to the system owner and both have been reviewed..

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

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

10.10 Does the system use web measurement and customization technology?

Not applicable. USDA APHIS VSISM 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 VSISM 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?

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.