Privacy Impact Assessment

Policy, E-Government and Fair Information Practices

- Version: 1.4
- Date: June 2021
- Prepared for: USDA OCIO-Policy, E-Government and Fair Information Practices (PE&F)

United States Department of Agriculture

Privacy Impact Assessment for the

NCAH Azure Platform (NAP): NCAH Quality Management (NQM)

June 2021

Contact Point

Robert Hazen
APHIS Marketing and Regulatory Program (MRP)
United States Department of Agriculture
(515) 337-6329

Reviewing Official

Tonya Woods
Director, Freed of Information and Privacy Act Staff
Animal and Plant Health Inspection Service (APHIS)
United States Department of Agriculture
(301) 851-2487

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 NCAH Quality Management (NQM) system is owned the by Animal and Plant Health Inspection Service (APHIS), Veterinary Service (VS), Diagnostics and Biologics (D&B), National Veterinary Services Laboratories (NVSL). NQM is made includes Master Control, a quality management system (QMS) that provides a software suite of compliance focused tools that supports the NVSL requirement to maintain compliance to applicable regulations and standards. This Privacy Impact Assessment (PIA) is being conducted as part of maintenance, assessment, and authorization.

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

Overview

NCAH Quality Management (NQM) supports the regulatory compliance needs of the APHIS Veterinary Services (VS) Diagnostics & Biologics (D&B), National Veterinary Services Laboratories (NVSL) and its scientific laboratory activities. NQM contains Master Control, an industry leading quality management system (QMS) that provides a software suite of compliance focused tools. As a web based (internal facing) and paperless system NQM supports the NVSL requirement to maintain compliance to applicable accreditation or certification regulations and standards.

- The NQM provides automated, streamlined management of:
- Product and compliance documents control
- Product customer complaints
- Process change control
- Process corrective and preventive action (CAPA)
- Training (non-AgLearn based)
- Audits
- Other quality management business processes

Information in the system includes procedures, standard operating procedures (SOPs), policies, work instructions (WI), references, manuals, policies, processes, and forms. NQM is used to ensure the most current version of a document is used for internal work processes, from scientific laboratory procedures to administrative procedures. Procedural training records, corrective actions, and auditing information will be stored in NQM. Additionally, the NQM is to ensure the compliant operation, maintenance,

and repair of NVSL owned laboratory equipment with the purpose of maintaining the Laboratories' calibration certificates. This includes tracking the training accomplishments of NVSL staff, which are needed to operate the NVSL owned laboratory equipment, laboratory processes and administrative processes.

NCAH information is manually shared from VS Laboratory Information Management System (VS LIMS) when a customer complaint potentially identifies a technical process in need of corrective or preventative action. The VS LIMS information will include PII on the animal owner or private citizen acting in a complimentary role to the owner.

Corrective and preventative action (CAPA) process is the only portion of NQM that may contain PII.

The NQM 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?

Information maintained includes laboratory and administrative documents, procedures, policies, instructions, references, manuals, forms, audits, calibration results, and reports. Specific information about individuals may include:

Diagnostic sample information:

- Wildlife / Zoo / Owner
- If Owner then:
  - Owner Name
  - Owner City
  - Owner State
  - Owner Zip
  - Owner Country

Slaughtering Establishment Information:

- Establishment Name
- Establishment Address
- Establishment City
- Establishment State

- Establishment Zip
- Establishment Country
- Establishment Email
- Establishment Fax
- Establishment Phone

Tuberculosis Sample Information:

- Food Inspector Name
- Veterinarian Name
- Market Buyer Name
- Market Buyer Address
- Market Buyer City
- Market Buyer State
- Market Buyer Zip
- Market Buyer Country

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

Laboratory and administrative documents, standard operating procedures (SOPs), policies, processes, work instructions (WI), references, manuals, forms, laboratory internal audits (internal audits of laboratory activities, administrative procedures, calibration), and corrective action & preventive action (CAPA) reports.

For NCAH, PII may be collected in Veterinary Services Laboratory Information Management System (VS LIMS) and can be moved to NQM when a complaint is submitted and follows the CAPA process. NVSL employees manually upload or manually enter information from VS LIMS to NQM may include information from State and private veterinary diagnostic laboratories, private veterinary practitioners, Federal meat inspectors, Federal field veterinarians, and others. In addition, VS LIMS information includes laboratory samples from other countries for import cases and for cases where diagnostic assistance is requested.

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

The information is maintained in NQM to maintain compliance with the Laboratories' accreditation or certification requirements and standards. Collecting the information listed in Sections 1.1 and 1.2 of this document NQM helps automate, streamline, and manage the following under a single web-based platform:

- Document control
- Document change control
- Training control (non-Aglearn related training certificates)
- Audits (internal audits of laboratory activities, administrative procedures, calibration, management systems compliance)
- CAPA (Corrective Action & Preventive Action)

- Other quality management business processes

Laboratory and administrative documents, SOP, policies, processes, WI, references, manuals, forms, internal laboratory audits, and CAPA are maintained through subsequent revisions for the benefit of document owners and knowledge retention.

Non-PII animal or sample information is disseminated to DHS, DHS contractors, State, university, international, or other collaborating laboratories consistent with the support of safeguarding animal health.

Any information, to include PII, may be included in the artifacts submitted to the accreditation or certification bodies in order to continue the government's accreditation or certification of the NVSL.

Information may also be disseminated in response to a Freedom of Information Act (FOIA) request.

1.4 How is the information collected?

Information as described in Sections 1.1 and 1.2 is APHIS employee generated/created within the NQM application. The Sample, Establishment, and Testing information listed in Section 1.1 is collected from VS LIMS when a customer submits a complaint to the NVSL.

1.5 How will the information be checked for accuracy?

Information as described in Sections 1.1 and 1.2 is checked for accuracy via peer review (subject matter experts), quality and document managers, and the employee's supervisor. After the employee's supervisor approves the information, the information is then sent to the appropriate Program quality manager for final review/authorization.

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

Specific legal authorities for NQM 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

Improper disclosure of privacy data is mitigated through approved system access that is limited to NVSL Quality Assurance employees. 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.

NQM information is used to maintain compliance with ISO accreditation or certification. Additionally, the information is used to help automate, streamline and manage the following under a single web-based platform:

- document control, change control
- training control (non-Aglearn related training certificates)
- audits (internal audits of laboratory activities, administrative procedures, calibration, management systems compliance)
- CAPA (Corrective Action & Preventive Action)
- customer complaints
- other quality management business processes
- The PII maintained in the system is used to correct processes and prevent future actions that may be the root cause of future complaints.

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

NQM commercial off the shelf (COTS) software Master Control contains pre-defined and customized reports. The data contained in the reports is used to automate and streamline document and change control. This includes (but is not limited to): outstanding training, ownership of documents, documents assigned to individuals/groups, pending CAPA reports/review, etc.

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

The system uses publicly available International Organization for Standardization (ISO) accreditation requirements (to maintain ISO accreditation), A2LA (an accrediting body with additional requirements that is used for clarification/guidance of ISO requirements), equipment manuals and vendor websites (for instrumentation), and also scientific journal articles for scientific test validation.

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 D&B NVSL management. NQM COTS, Master Control, also has security controls to address access to and security of information.

- 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
- Users have formal training on how to properly 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?

These electronic records are retained for five (5) years.

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 to the Veterinary Services (VS) records management liaison for review and submission to NARA. As of March 2021 this is still under review.

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. NQM 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, 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?

The data remains at NCAH and is not shared. All Privacy data is restricted to only approved NVSL government employees within the Quality Management Program, lab staff and lab management with permissions in NQM to input PII as part of the CAPA process.

4.2 How is the information transmitted or disclosed?

No data is transmitted. The privacy data is received from VS LIMS based on customer complaints or internal audit for review in NQM by approved NVSL staff.

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 NQM customer and employees will be protected by USDA APHIS VS STAS NVSL management. Target systems also have security controls to address access to and security of information.

- All information sharing with internal systems is done manually over the internal APHIS network (VS LIMS data is manually added to NQM).
- Access to the data in the systems (NQM and USDA email) is controlled and documented by formal authorization.
- All access to the system is limited by account identification and Enterprise Active Directory.
- 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 the following external entities. When information is shared that contains PII, the PII shared is listed in Section 1.1:

- Contractor or DHS employees located at PIADC (Plum Island Animal Disease Center) in Plum Island, NY and NBAF (National Bio and Agro Defense Facility) in Manhattan, KA. These groups do not have access to NQM and do not receive PII data extractions.
- Contracted vendors for ISO accreditation and certification. Information shared includes SOPs, work instructions, CAPAs, etc. for the purpose of ISO accreditation or certification. This group does not have access to NQM. Artifacts used to document accreditation or certification related to customer complaints may contain PII data extractions.
- State and international laboratories, universities, and other entities for collaborative purposes and cooperative agreements. This group does not have access to NQM and does not receive PII data extractions.

International entities to establish testing capacity in other countries. This enables consistent processes/procedures to support the mission of safeguarding animal health. This group does not have access to NQM and does not receive PII data extractions.

The Corrective and Preventative Action (CAPA) process is an internal Quality Management (QM) Process. Based on a customer complaint, audit finding, or incident report, a CAPA may be initiated. Based on the input of the CAPA process, the privacy data may be input into NQM. The NQM process stays internal to the NVSL for review. The CAPA artifacts are kept for possible review during ISO accreditation or certification, but not shared outside of this area.

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 PII information shared outside of the Department is compatible with the original collection. The PII may accompany the customer's complaint with the intent of resolving the issue and avoid reoccurring issues for the customer. The NVSL quality managers validate this outcome; the ISO accreditation or certification body ensures NCAH are following the procedures we have set forth to maintain accreditation or certification. This organization is named through contracted activity cleared for access to USDA data and are bound by a confidentiality agreement.

Department contractors who are vendor employees can be provided access to NQM for troubleshooting purposes and maintenance. This vendor is named through contracted activity cleared for access to USDA data and are bound by a confidentiality agreement.

APHIS SORN 19 is being updated to clearly make notification of the movement of PII from VS LIMS to NQM as described in this assessment.

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

The contracted vendors for ISO accreditation and certification described in Section 5.1 must pass through NCAH campus' physical security, are covered by a non-disclosure agreement, and are only provided escorted access to view records potentially containing PII. Vendor specific technical support may potentially view records containing PII during the investigation of a technical incident or software defect. Vendor technical support is covered by a non-disclosure agreement and secure email is used to transmit information and communicate back and forth in order to resolve the technical issue.

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

Uses of information are in accordance with the stated purpose and use of the original collection of a customer complaint by VS LIMS. The privacy risks are limited to the minority of customer complaints that originate from an incident in VS LIMS and also contain PII. The other uses of information listed in Section 1.3 do not contain PII. The privacy risk is the mishandling of PII in customer complaints. To mitigate this access to NQM must be explicitly authorized and the application is protected by the following measures:

- All access to the system is limited by username and password.
- Application limits access to relevant information by assigned application functions to roles. Additionally, NQM has areas within the application (called "vaults") where specific documents, information, and processes can be controlled at a user-specific level. This prevents access to unauthorized information.
- Access to NQM is internal to USDA APHIS NVSL staff with supervisory and Quality Management approval.
- The USDA warning banner must be acknowledged at application login.

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.

Yes. APHIS SORN-19. https://www.ocio.usda.gov/sites/default/files/APHIS-19.txt.

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

Yes. The information shared from VS LIMS was included in SORN APHIS-19 Laboratory Information Management System, https://www.federalregister.gov/articles/2013/10/01/2013-23868/privacy-act-systems-of-records-labware-laboratory-information-management-system

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

No, individuals external to NVSL that submit samples to be tested at the laboratory must submit all data required by VS LIMS to assign appropriate test and report results. Individuals are not compelled to submit samples to the laboratory, however if an individual does choose to submit samples, required information to include personal information must be included. Individuals do not have the opportunity to decline to have their information shared outside of VS LIMS should their submitted information be moved to a complaint in NQM.

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, the NQM submitters' data are treated uniformly. Only information that is cleared through the Freedom of Information Act is available for use.

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.

Information is not collected with NQM. Data is collected using VS LIMS with the individual's knowledge, and data are voluntarily submitted to the laboratory along with test samples.

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?

If an employee discovers inaccurate information in NQM, they can contact the NVSL Quality Management (QM) unit or Privacy act office annotated in 7.1.

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

All USDA employees are notified of the procedures to correct information by their human resource department. The owners identified in Section 1.1 would require updates to the information submitted to NVSL.

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 7.2 and 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.

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.

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?

NQM utilizes the User Management System (UMS) to assist in access requests and tracking of user's access. A Supervisor submits an access request for employee's access to the system. Once the application is reviewed the applicable NQM administrators are notified of additions. Every calendar Quarter, one quarter of the accounts are reviewed for accuracy.

Access is based on the need to do business and is determined by USDA APHIS VS management. All access to the NQM application is authorized and documented by an APHIS 513 form via a digital submission within UMS.

8.2 Will Department contractors have access to the system?

Department contractors can be provided access to NQM for troubleshooting purposes is that need arises. The contractor's access will be evaluated during the user certification process for NQM.

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 NQM 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. Based on the Federal Information Process Standard (FIPS) 199, Standards for Security Categorization of Federal Information and Information Systems, review of the overall data contained within NAP is categorized as a "Moderate" system for purposes of Confidentiality, Integrity and Availability. 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?

Technical safeguards and auditing measures are in accordance with FIP 199/200 Moderate Baseline Security Controls. Some of the technical safeguards for NQM are a security model that includes auditing, role-based views, field-level security, and division of security. This means any events, such as create, modify, soft deletion, and user login activity are audited at the field level. In addition, 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 for access to the data within NQM is through role-based access and data restriction configurations. Furthermore, views and field-level access are role-based, preventing users from seeing, accessing, and/or making changes to individual fields or records they do not have access to. NQM users must be validated against USDA Client Excellence Center (CEC) Active Directory for authentication.

- All access to the data in the system is controlled by formal authorization using UMS.
- All access to the system is limited by account identification and Enterprise Active Directory.
- Warning banner must be acknowledged before logging in.
- All information sharing with internal systems is done over the internal APHIS network.

Auditing is enabled both at the application and database level.

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?

The privacy information collected and stored in NQM is at risk from improper handling during transit. This risk is mitigated through user training and limiting use to Federal owned networks. Users are trained at least annually. Information is limited to APHIS, ARS, or DHS systems.

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?

NQM is commercial off the shelf software (COTS), called Master Control, that provides a software suite of compliance focused tools that supports the NVSL requirement to maintain compliance to applicable regulations and standards.

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

N/A –NQM 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

KARL HOCHSTEIN
Digitally signed by KARL HOCHSTEIN
Date: 2021.07.06 18:08:05 -05'00'

Karl J. Hochstein
NCAH Azure Platform (NAP) System Owner, NVSL Associate Director
Animal and Plant Health Inspection Service
United States Department of Agriculture

AARON ALEXANDER
Digitally signed by AARON ALEXANDER
Date: 2021.07.07 07:54:53 -06'00'

Aaron Alexander
Associate Chief Information Security Officer, MRPBS
Marketing and Regulatory Program Business Services
United States Department of Agriculture

JANELLE JORDAN
Digitally signed by JANELLE JORDAN
Date: 2021.07.01 10:11:20 -04'00'

Tonya Woods
APHIS Privacy Act Officer
Animal and Plant Health Inspection Service
United States Department of Agriculture