



USDA Privacy Impact Assessment

Fiscal Year 2024

Privacy Division (PD)
Cybersecurity and Privacy Operations Center (CPOC)
U.S. Department of Agriculture

Revisions

Date	Version	Notes
09/06/2023	1.0	Documented created.
02/12/2025	1.1	Removed “Gender” and “Sexual Orientation” from Biographical Information in accordance with Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.”

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Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	Emergency Management Response Services
Program Office	Veterinary Services
Mission Area	MRP
CSAM Number	1962
Date Submitted for Review	-

Mission Area System/Program Contacts

Role	Name	Phone Number
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Abstract

The Emergency Management Response Services 2.0 system (EMRS) is used by Veterinary Services (VS) to manage and investigate animal disease outbreaks in the United States. The system allows VS to collect data on animal disease incidents, track resources, manage the disease response, create reports, generate maps and track permits that allow for the movement of goods within disease control areas. EMRS collects the personally identifiable information (PII) of the owners of animals or properties (“premises owners”) that are the subject of animal disease outbreaks, the representatives of companies that apply for permits to move products within or out of animal disease control areas, and state, tribal and local animal disease responders working on behalf of the USDA to help track and mitigate animal disease outbreaks. This PII consists of names, phone numbers, addresses, personal email addresses, business phone numbers, business addresses, business email addresses, signatures, and the geographic coordinates of properties.

Overview

The EMRS is an incident management data collection system utilized by Veterinary Services to manage and investigate animal disease outbreaks and instances of foreign animal disease (FAD) in the United States. EMRS users can:

- Collect, enter and view animal disease data
- Manage activities like FAD investigations
- Manage and track resources (personnel and equipment)
- Monitor progress of response operations
- Create reports
- Create maps of areas affected by animal disease outbreaks
- Create tasks for workers identifying, managing and mitigating animal disease outbreaks

EMRS is custom built within the Microsoft Power Apps platform and is accessed by approved users via Microsoft Edge or other compatible Internet browsers. Primary users of EMRS are Federal and State veterinary medical officers, animal health technicians, and various disease specialists and epidemiologists from APHIS and from State cooperators.

There are two extensions to EMRS also in use which serve as alternate user interfaces but enforce all applicable security through the Power Apps Application Programming Interface (API):

- EMRS Permitting Gateway
- EMRS2GO

Gateway allows producers to request and manage movement permits, permitting them to move products within and out of disease control areas. Users are only able to access their own company's information within the portal and do not access EMRS directly.

EMRS2GO is a Power Apps Canvas App that runs on the federal and state users' laptops. It creates a streamlined interface for federal and state users who enter information into EMRS, allowing them to

quickly and easily capture information associated with surveillance visits. It also allows them to capture this information while offline when they are in areas without Internet access.

EMRS collects the PII of roughly 100,000 individuals, including the owners of premises where animal disease events occur, individuals who apply for movement permits and state employees working with the USDA on animal disease surveillance and mitigation efforts. The information in EMRS is authorized to be collected under the Animal Health Protection Act (AHPA) (7 U.S.C.8301 et seq.).

Section 1: Authorities and Other Requirements

The following questions are intended to identify all statutory and regulatory authority for operating the project, including the authority for collection, what SORN applies, if an ATO has been completed and if there is Paperwork Reduction Act coverage.

What legal authorities and/or agreements permit the collection of information by the project or system?

The Animal Health Protection Act (AHPA) (7 U.S.C.8301 et seq.) provides the authority for the Secretary to prevent, detect, control, and eradicate diseases of animals. EMRS2 is the system used to act on this authority. Any additional authority comes from the specific state under which an investigation is conducted.

Has Authorization and Accreditation (A&A) been completed for the system?

Yes:

- The Security Plan: Updated and signed: 7/6/2023
- The Authorization Status: Renewed as of 4/5/2023 until 4/5/2026
- The Risk Review Completion Date: 8/21/2024
- The FIPS 199 classification of the system: MODERATE

What System of Records Notice(s) (SORN(s)) apply to the information?

The [APHIS-11](#) SORN is the official notice.

Is the collection of information covered by the Paperwork Reduction Act?

Yes. The Appraisal and Indemnity Claim Form (VS 1-23, OMB #s 0579-0007, 0579-0047, 0579-0065, 0579-0101, 0579-0146 and 0579-018) is used to collect and verify information.

Section 2: Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.

What information is collected, used, disseminated, or maintained in the system/program?

Identifying Numbers

- Employee Identification number
- Personal Mobile number
- Business Mobile number (sole proprietor)

Biographical Information

- Name (Including Nicknames)
- Business Mailing Address (sole proprietor)
- Business Phone or Fax Number (sole proprietor)
- Home Phone or Fax Number
- Home Address
- ZIP Code
- Personal Email Address
- Business Email Address
- Global Positioning System (GPS)/Location Data

Distinguishing Features

- Signatures

Specific Information/File Types

- Case Files

Additional Items

- Premises ID Number

What are the sources of the information in the system/program?

The premises ID (a unique USDA identifier associated with each property that is the subject of an animal disease event) and geographic coordinates are provided by the USDA Animal Disease Traceability Information System (ADTIS), which is also owned by APHIS. The PII of the owners or contacts at the premises (name, address and phone number) come from a variety of sources. In some cases, the owners provide their own information directly to the USDA. In other cases, state, local and tribal health officials will gather this information and provide it to the USDA. Additionally, USDA, state, local or tribal health officials will use public sources, such as google address searches or public tax records to find out who owns a property in order to contact them about animal disease events occurring on them.

The PII of the points of contact at the companies that are applying for movement permits is provided by the representatives of the company that is applying for the permit. This PII consists of their names, addresses, phone numbers and email addresses. This may be their personal or business contact information, depending on the circumstances.

The state, tribal and local animal health officials working on behalf of the USDA to help identify and respond to animal disease outbreaks provide their own PII. This consists of their names, work email addresses, work phone numbers and work addresses.

How is the information collected?

The Premises ID and geographic coordinates for each property associated with an animal disease event are transmitted from ADTIS to EMRS via a one-way direct system integration. The name, address and phone number of the owner of the premises is entered manually into the system by a USDA, state, local or tribal official using the sources listed in question 2.2. This PII is confirmed by the premises owner when the USDA generates an Appraisal and Indemnity Claim Form (VS-123) with the PII on it and provides it in-person to the premises owner. The premises owner then reviews this form, fills in indemnity information about their premises, signs the forms and hands the form back to the USDA representative. The USDA representative then uploads an electronic copy of the form into EMRS.

The contacts at the companies that are applying for movement permits submit their information (names, phone numbers, addresses and email addresses) via the EMRS Gateway portal. These contacts may also complete various state animal health official forms for permit requests/permit applications and submit them to the State Animal Health Official who reviews them and manually enters the information into EMRS.

The state, tribal and local animal health officials working on behalf of the USDA to help identify and respond to animal disease outbreaks provide their own PII by filling out the APHIS 513 Form, getting it signed by the USDA Area Veterinarian in Charge (AVIC) and emailing it to their state's EMRS Network Associate who then sets up their EMRS account.

Does the project/program or system use information from commercial sources or publicly available data. If so, explain why this is used?

USDA, state, local and tribal health officials use Google address searches as well as publicly available tax records in order to find out who owns particular properties so they can contact them about animal disease activities. They also use these sources to confirm that the PII they have on file for premises is accurate and up to date. The PII obtained from these publicly available sources consists of names, addresses and phone numbers.

EMRS also uses Bing Maps for imagery only and utilizes no other Bing Map services. The maps are needed to assess the geographical location of infected premises and at-risk premises within the control area and/or surveillance zone. Field responders utilize geographical coordinates with maps to conduct surveillance activities in the affected area. The Bing mapping information does not contain PII.

How will the information be checked for accuracy? How often will it be checked?

All disease reporting officers who enter information about premises and animal owners are required to confirm the information in EMRS against publicly available sources, including google address searches and public tax records to ensure that the PII is accurate and up to date. Checking PII for accuracy is a key requirement that is included in the disease reporting training that these individuals receive on an annual basis.

The PII of the state officials who use EMRS is checked by the system owner on VS Form 513 when they grant access to the system. Additionally, the state, local and tribal health officials can review their own PII and update it directly in the system if needed.

Does the system/program use third-party websites?

No

What is the purpose of the use of third-party websites?

N/A

What PII will be made available to the agency through the use of third-party websites?

N/A

Privacy Impact Analysis: Related to characterization of the information.

Privacy Risk: There is a risk of collecting unneeded or extraneous PII and of collecting inaccurate information.

Mitigation: PII collected is minimized to only that which is required for the intended purposes as outlined in the SORN. The PII of premises owners is checked against google address and public tax records to ensure that the PII is correct and that a premises is associated with the correct owner. Checking this information is a formal requirement of disease reporting officers' work and is included in the disease reporting training that these individuals receive on an annual basis. When federal and state workers visit premises that is the site of an animal disease event, they generate a VS 1-23 form that includes the PII of the premises owner. The premises owners are instructed to review the form to confirm that the information is accurate before signing it.

Additionally, data fields in EMRS are lookup or drop-down fields when possible. This reduces the risk of an individual manually entering information into the incorrect field.

Section 3: Uses of the Information

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

Describe why and how the information collected, used, disseminated and/or maintained will support the program's business purpose?

The PII of the premises owners is used to understand who owns a particular property or animals that are the location/subject of an animal disease outbreak and to be able to contact them and update them about disease mitigation efforts. It is also used to track indemnity payments that cover costs associated with disease mitigation efforts (the financial and payment information is not collected in EMRS).

The PII of the contacts at the companies that are applying for movement permits is used to issue and track the permits, as well as to follow up with questions or additional information, in cases where products are being moved within, into or out of animal disease control areas.

The PII of the state, tribal and local animal health officials working on behalf of the USDA is used to understand who is working on particular projects and to be able to track tasks and mitigation efforts.

Does the system/project/program use technology to conduct electronic searches, queries, or analysis in an electronic database to discover or locate a predictive pattern or anomaly? If so, state how USDA plans to use such results.

EMRS is not used to discover or locate a predictive pattern or anomaly.

Privacy Impact Analysis: Related to uses of the information.

Privacy Risk: There is a risk that information will be used outside of its intended purpose.

Mitigation: EMRS adheres to the APHIS-11 SORN which lays out the PII being collected as well as how it is used. Access controls are also in place to ensure that only individuals who require access to the system are granted it. To request access, federal users fill out APHIS Form 513 and submit it to their supervisor for approval and signature. Once the supervisor approves the request, access is granted to the system by the system owner. State users also fill out APHIS Form 513. They submit it, along with a current information security awareness training certificate, to their USDA Area Veterinary in Charge (AVIC) who reviews the form and signs it. Once the request has been approved by the AVIC, access is granted to the system by the system owner. Access to information within the system is also limited to a need-to-know basis, with roles assigned to users that are appropriate for their work responsibilities. All users also take Information Security Awareness Training (ISAT) which teaches them the proper handling of PII.

Section 4: Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information.

How does the project/program/system provide notice to individuals prior to collection?

A Privacy Act statement is displayed to state users and permit gateway applicants on the EMRS login page. Privacy Act statements will be added to the collection forms that receive information from premises owners. Notice to all individuals is also provided via the publicly available System of Record Notice and the Privacy Impact Assessment (this document).

What options are available for individuals to consent, decline, or opt out of the project?

The USDA has a legal obligation under the Animal Health Protection Act (AHPA) (7 U.S.C.8301 et seq.) to respond to animal health outbreaks. Therefore, the USDA must obtain the geographic coordinates and addresses of the locations of an outbreak and attempt to reach out to the owners of the properties to inform them of the issues they are facing and any mitigation efforts that will be needed. However, property and animal owners may choose not to provide their name and phone number. However, the USDA will not be able to contact them about disease control updates and mitigation efforts affecting their property or animals.

Individuals at companies who apply for permits in EMRS are required to submit their PII, in order for the USDA to be able to contact them to ask questions and get more information when needed. If an individual chooses not to apply for a permit, the company may not be able to move affected products within, into and out of disease control areas.

Privacy Impact Analysis: Related to notice.

Privacy Risk: There is a risk of individuals not being aware of what information is being collected and how the USDA uses it.

Mitigation: A Privacy Act Statement is provided electronically on the EMRS login page to state and Permit Gateway users, informing them of how their information will be used. EMRS adheres to the APHIS-11 SORN which is posted publicly and lays out the PII being collected as well as how it is used. A Privacy Act Statement will be added to the forms that collect information from the premises owners.

Section 5: Data Retention

The following questions are intended to outline how long information will be retained after the initial collection.

What information is retained and for how long?

All records are currently retained permanently in accordance with unscheduled records management policy.

Has the retention schedule been approved by the USDA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.

No. APHIS VS has developed record retention schedules, but until the schedule is submitted to NARA, electronic systems are classified as permanent in accordance with unscheduled records management policy.

Privacy Impact Analysis: Related to retention of information.

Privacy Risk: The longer that PII is maintained, the higher the likelihood that it will be compromised or become inaccurate or outdated.

Mitigation: Only the minimum amount of PII needed for emergency management and permit issuance is initially collected from individuals. The PII of premises owners is always checked for accuracy by the disease reporting officer any time a new disease event occurs affecting their property. This ensures that information in the system is always up to date when a new disease event occurs. This is a formal requirement of the job and is highlighted in their annual training. Individuals can also access their information, including information being held for record retention purposes, and request that it be updated in the system by reaching out to their USDA or state contact, or by submitting a Privacy Act or FOIA request. Once the EMRS2 schedule is submitted to NARA and approved, procedures will be developed to dispose of information securely, following the NARA retention schedule.

Section 6: Information Sharing

The following questions are intended to define the content, scope, and authority for information sharing.

With which internal organizations and/or systems is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

EMRS receives information from the Animal Disease Traceability Information System (ADTIS) which consists of the premises ID and geo-coordinates via a direct system integration. The premises ID serves as a unique identifier, ensuring that information remains consistent across VS systems. The geo-coordinates allow VS to understand where an animal disease event is occurring in order to respond to it.

EMRS electronically transmits the premises owner's name, address and premises ID to the Veterinary Services Laboratory Information Managements System (VS LIMS). VS LIMS manages animal sample testing, and transmitting this information ensures consistent records across VS systems.

Both ADTIS and VS LIMS are owned by APHIS.

Privacy Impact Analysis: Related to internal sharing and disclosure.

Privacy Risk: The unauthorized disclosure of PII is the primary privacy risk related to internal sharing.

Mitigation: The integration between ADTIS (which sends to premises ID and geographic coordinates of properties) and EMRS is secured by the USDA network. Additionally, all users receive security basics training, which covers the proper sharing of information, and are required to sign rules of behavior before being given access to the system.

With which external organizations (outside USDA) is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?

PII is not shared with organizations outside of the USDA, except for state, local and tribal animal health officials who are working on behalf of the USDA. These individuals access the information listed in #2.1 directly in EMRS as part of their work responsibilities in responding to animal disease events. In some exceptional cases, information may be shared externally. These reasons are listed in the SORN that is publicly available.

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk: Information is shared with state, local and tribal animal health officials working on behalf of the USDA, and therefore there is a risk of providing access to unauthorized individuals.

Mitigation: Access to the system by external state users requires the approval of the USDA Area Veterinary in Charge (AVIC) and is documented on APHIS Form 513. EMRS also uses role-

based permissions which limit access to information and functionality to what is needed for the user's job responsibilities. All state employees are also required to take information security awareness training, which covers the proper handling of PII.

Section 7: Redress

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about him or her.

What are the procedures that allow individuals to gain access to their information?

Individuals may submit Privacy Act and Freedom of Information (FOIA) Act requests to gain access to their information. These requests must be in writing and should be submitted to the APHIS Privacy Act Officer, 5601 Sunnyside Avenue AP-740 Beltsville, MD 20705; or by facsimile (301) 734-5941; or by email APHISPrivacy@usda.gov; or by using the APHIS Privacy Act and FOIA Online Portal. In accordance with 7 CFR 1.112 (Procedures for requests pertaining to individual records in a record system), the request must include the full name of the individual making the request; the name of the system of records; and preference of inspection, in person or by mail. In accordance with 7 CFR 1.113, prior to inspection of the records, the requester shall present sufficient identification to establish that the requester is the individual to whom the records pertain. In addition, if an individual submitting a request for access wishes to be supplied with copies of the records by mail, the requester must include sufficient data for the agency to verify the requester's identity.

Individuals who apply for permits can also access their information directly in the Permit Gateway. State animal health officials can also access their information directly in their EMRS profile

What are the procedures for correcting inaccurate or erroneous information?

Individuals seeking to contest or amend records maintained in this system of records may submit a Privacy Act Request following the instructions listed out in Section 7.1. All requests must state clearly and concisely what record is being contested, the reasons for contesting it, and the proposed amendment to the record. Additionally, if a premises owner experiences a change in contact information, or needs to correct a record, they may reach out to their state or federal point of contact and request a correction. The state or federal contact may then correct the information in EMRS or elevate the request directly to the VS Emergency Management Coordinator.

State employees can update their information directly in the system on their EMRS profile. Permit applicants can update their information in the Permit Gateway portal.

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

Individuals are notified of the procedures for submitting a Privacy or FOIA request via this PIA and the APHIS Privacy Act/FOIA web page. Additionally, state employees and individuals who are applying for permits on behalf of a company are notified of how to update their information in the system via the guides and training on the EMRS website.

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

N/A, a formal redress process is provided.

Privacy Impact Analysis: Related to redress.

Privacy Risk: There is a risk that individuals will not be able to access or update their information or be aware of how to do so.

Mitigation: Individuals can submit Privacy and Freedom of Information Act requests as described in Section 7.1. Additionally, premises owners are asked to confirm their information on the Appraisal and Indemnity Claim Form (VS 1-23) and can also contact their state or USDA representative and ask them to update their information at any time. State employees and permit applicants can also update their information directly in their system profile, as outlined in the guides and training system.

Section 8: Auditing and Accountability

The following questions are intended to describe technical safeguards and security measures.

How is the information in the system/project/program secured?

All the information in EMRS is encrypted, which makes it unreadable if compromised. EMRS uses session time-out, which logs out users after a period of inactivity. Data can be retrieved only by personnel who successfully authenticate using their eAuthentication PIV or Login.gov/eAuthentication username/password. APHIS personnel who input data must have a high-level eAuthentication account and are assigned roles that limit their access to information to only what is relevant for their job responsibilities.

What procedures are in place to determine which users may access the program or system/project, and are they documented?

Access to EMRS2 is based on the need to conduct business within the USDA and is approved by an authorized APHIS VS official. Criteria, procedures, and controls for providing access are documented in internal procedures and on the APHIS 513 form. To request access, federal users fill out APHIS Form 513 and submit it to their supervisor for approval and signature. Once the supervisor approves the request, access is granted to the system. State users also fill out APHIS Form 513. They submit it, along with a current information security awareness training certificate, to their USDA Area Veterinary in Charge (AVIC) who reviews the form and signs it. Once the request has been approved by the AVIC, access is granted to the system.

Users are assigned specific roles that align with their work responsibilities and the need to view different types of information. For example, roles for state and field-level staff limit access to records to those that fall in their geographic purview. Different roles also limit users to carry out activities in the system related to their job responsibilities, including collecting and entering animal disease data, managing and tracking resources, monitoring the progress of response operations, and creating reports and maps.

How does the program review and approve information sharing requirements?

Discussions are held between the System Owner and Information System Security Officer to determine requirements, with the system's Authorizing Official providing approval.

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

All users, including USDA users as well as state, tribal and local health officials, receive annual information security awareness training and are required to sign rules of behavior each year before being given access to the system.