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	Integrated Plant Health Information System
Program Office	Plant Protection and Quarantine (PP)
Mission Area	MRP/APHIS
CSAM Number	
Date Submitted for Review	March 11, 2025

Mission Area System/Program Contacts

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Abstract

The abstract provides the simplest explanation for the "what does the system do?" and will be published online to accompany the PIA link.

The Integrated Plant Health Information System (IPHIS) is a Web-based plant health data management system that is used to safeguard U.S. agriculture and natural resources against potentially harmful pests. It is used by all levels of plant health personnel (e.g., executives, managers, and field personnel) within the USDA Animal and Plant Health Inspection Service (APHIS), as well as state cooperators outside the Agency.

IPHIS collects information about plant pest and disease events, allowing the USDA to track existing plant threats and identify and prevent future ones.

IPHIS processes the personal information of the owners of properties where plant-related activities are occurring. This includes name, address, telephone number, fax number, email address and location (longitude/latitude) of their property. It collects the business information of the individuals representing cooperating organizations that are assisting the USDA in tracking, management, and mitigation of plant-related issues, which includes name, work email address, work phone number and signature.

Overview

The overview is the most important section of the PIA. A thorough and clear overview gives the reader the appropriate context to understand the responses in the PIA.

Plant Protection and Quarantine (PPQ) is a program within the USDA APHIS. PPQ safeguards U.S. agriculture and natural resources against the entry, establishment, and spread of economically and environmentally significant pests, and facilitates the safe trade of agricultural products. PPQ responds to new introductions of plant pests to eradicate, suppress, or contain them through various programs in cooperation with state departments of agriculture and other government agencies.

PPQ uses IPHIS to track plant pests and disease programs and events. IPHIS is an online portal for all levels of plant health responders within APHIS (e.g., executives, managers, incident commanders, and field personnel), as well as cooperating entities outside the Agency (e.g., diagnostic laboratories, state, local, academic, and industry) to enter and view data for plant health events nationwide. The information collected in IPHIS allows APHIS to better respond to and track existing plant threats and provides the basis for analysis of potential future threats.

IPHIS processes the personally identifiable information (PII) of property owners whose properties are the site of a USDA plant-related activity and of individuals who are representing a cooperating organization that is assisting the USDA with these activities. The PII of property owners consists of their name and contact information (name, address, phone number, email address, and geographic location of their property). The PII of the individuals representing cooperating organizations consists of their name, work email address and phone number, and signature.

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.

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

Several laws and agreements permit the collection of the information that IPHIS processes. These are: The Plant Protection Act (7 U.S.C. 7701-7786); The Honeybee Act (7 U.S.C. 281-286); The Food Conservation and Energy Act of 2008 ((H. 6124)); and the Emergency Action Notifications (EANs) process.

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

Yes. The following are specifics of the current status:

The Security Plan Status: IN PROGRESS OF UPDATE
The Security Plan Status Date: 2/9/24
The Authorization Status: ATO
The Authorization Date: 2/24/15 (initial); 4/5/21 (renewed)
The Authorization Termination Date: 4/5/24
The Risk Review Completion Date: 2/9/24
The FIPS 199 classification of the system (LOW/MODERATE/HIGH): MODERATE

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

USDA/APHIS-23, Integrated Plant Health Information System (IPHIS). Published Document: 2021-10707 (86 FR 27553).

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

Yes, the representatives at cooperating organizations who are facilitating the signing of the compliance agreements enter their information on the Compliance Agreement Form (PPQ Form 519 or 519A (OMB APPROVED 0579-0015, 0049, 0054, 0088, 0124, 0155, 0187, 0310, 0322, 0337, 0346, 0363 0383, 0450).

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.

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

PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Mark all applicable PII and data elements in the table.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional sensitive PII is collected, used, disseminated, created, or maintained, please list those in the text box below:

Identifying Numbers

☐ Social Security number	☐ Truncated or Partial Social Security number	☐ Driver's License number
☐ Passport number	☐ License Plate number	☐ Registration number
☐ File/Case ID number	☐ Student ID number	☐ Federal Student Aid number
☐ Employee Identification number	☐ Alien Registration number	☐ DOD ID number
☐ Professional License number	☐ Taxpayer Identification number	☐ Business Taxpayer Identification number (sole proprietor)
☐ Credit/Debit Card number	☐ Business Credit Card number (sole proprietor)	☐ Vehicle Identification number
☐ Business Vehicle Identification number (sole proprietor)	☐ Personal Bank Account number	☐ Business Bank Account number (sole proprietor)
☐ Personal Device Identifiers or Serial numbers	☐ Business Device Identifiers or Serial numbers (sole proprietor)	☐ Personal Mobile number

☐ Health Plan Beneficiary number	☐ Business Mobile number (sole proprietor)	☐ DOD Benefits number

Biographical Information

☒ Name (Including Nicknames)	☒ Business Mailing Address (sole proprietor)	☐ Date of Birth (MM/DD/YY)
☐ Ethnicity	☒ Business Phone or Fax Number (sole proprietor)	☐ Country of Birth
☐ City or County of Birth	☐ Group Organization/Membership	☐ Religion/Religious Preference
☐ Citizenship	☐ Immigration Status	☒ Home Phone or Fax Number
☒ Home Address	☐ ZIP Code	☐ Marital Status
☐ Spouse Information	☐ Children Information	☐ Military Service Information
☐ Race	☐ Nationality	☐ Mother's Maiden Name
☒ Personal Email Address	☒ Business Email Address	☒ Global Positioning System (GPS)/Location Data
☐ Employment Information	☐ Alias (Username/Screenname)	☐ Personal Financial Information (Including loan information)
☐ Education Information	☐ Resume or Curriculum Vitae	☐ Business Financial Information (Including loan information)
☐ Professional/Personal References		

Biometrics

☐ Fingerprints	☐ Hair Color	☐ DNA Sample or Profile
☐ Retina/Iris Scans	☐ Video Recording	

Distinguishing Features

☐ Palm Prints
☐ Dental Profile
☐ Eye Color
☐ Photos
☒ Signatures

Characteristics

☐ Vascular Scans
☐ Scars, Marks, Tattoos
☐ Height
☐ Voice/Audio Recording
☐ Weight

Device Information

☐ Device Settings or Preferences (e.g., Security Level, Sharing Options, Ringtones)
☐ Cell Tower Records (e.g., Logs, User Location, Time)
☐ Network Communication Data

Medical /Emergency Information

☐ Medical/Health Information
☐ Workers' Compensation Information
☐ Mental Health Information
☐ Patient ID Number
☐ Disability Information
☐ Emergency Contact Information

Specific Information/File Types

☐ Personnel Files
☐ Health Information
☐ Case Files
☐ Law Enforcement Information
☐ Academic/Professional Background Information
☐ Security Clearance/Background Check
☐ Credit History Information
☐ Civil/Criminal History Information/Police Record
☐ Taxpayer Information/Tax Return Information

[List additional information collected but not listed above here (for example, a personal phone number that is used as a business number).]

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

The owners of properties where plant events occur provide their own name, address, telephone number, fax number, email address and location (longitude/latitude) of their property.

The points of contact at cooperating organizations that are assisting PPQ in their work and therefore signing compliance agreements provide their own name, work email address, work phone number, and signature.

2.2.1. How is the information collected?

Property owners provide their information verbally to APHIS PPQ employees who are visiting their property. The PPQ employees then enter the data into IPHIS via the IPHIS Data Collector (IDC) mobile application, IPHIS bulk import spreadsheet template, or directly in the system via the IPHIS web-based application interface. In a small number of cases, the PPQ team members will write the data down on paper and subsequently enter it directly into IPHIS within 3 business days after collection.

Points of contact at cooperating organizations enter their information on PPQ Form 519 or 519A and then physically hand the form to their APHIS contact. The APHIS employee then enters the information into IPHIS, uploads an electronic copy of the form and destroys the paper form at the end of the regulatory period.

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

IPHIS uses commercially available mapping services. These services provide background/reference maps for displaying data and help determine geographic coordinates when only address information is available.

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

2.5. The data is checked during entry by field staff conducting the work. PPQ conducts address validation through geocoding to verify addresses and coordinates. A quality control workflow identifies potential data entry errors, which are sent to the appropriate offices for correction. IPHIS subject matter experts and supervisors ensure accuracy when conducting data entry and when reviewing validation and audit reports. Does the system/program use third-party websites?

Yes

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

This information is used to provide mapping and geographic context to plant issues and mitigation activities.

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

PII is not gathered from these mapping services.

2.6. **Privacy Impact Analysis**: Related to characterization of the information.

Follow the format below:

Privacy Risk: There is a risk of extraneous information being collected and the information being inaccurate, especially with the manual entry of data into the system by PPQ staff.

Mitigation: The information is checked for accuracy at the time of collection, and again through the formal weekly data quality assessment process. PPQ conducts a simple address confirmation by geocoding the address which comes back with a validated address and coordinates. PPQ also employs a quality control workflow to look for misspelled terms. All PPQ staff are trained in maintaining accurate records. The PII in the system is collected directly from individuals by PPQ staff.

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.

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

3.2. PII of property owners is used to communicate about PPQ activities on their properties and determine necessary actions when pests or weeds are found. In emergencies, owner information helps PPQ respond to and mitigate issues. PII for cooperating organization contacts facilitates communication and compliance agreement signing. 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.

3.3. No. While the system uses business intelligence software to generate reports about plant health data, it does not conduct electronic searches or analyses to discover predicative patterns or anomalies. PII is only included in reports when necessary for emergency response.

3.4. **Privacy Impact Analysis**: Related to uses of the information.

Follow the format below:

Privacy Risk: There is always a risk that information will be used for purposes other than legitimate ones listed in the SORN.

Mitigation: PPQ staff are trained to only use information for its originally intended purposes as outlined in SORN. Access to the application must be authenticated via USDA eAuthentication requiring user ID and password. Privileges and permissions assigned to enter, view, update, modify or delete the information given to individual user accounts are based on the position responsibilities. Managers review all new and updated access requests, and once approved, the system administrator provides access. User accounts become inactive after 60 days, if the user has not accessed IPHIS. Users must then request IPHIS access again, and the system administrator verifies their need and roles prior to granting access.

All cooperating agencies are required to sign MOUs (Memorandum of Understanding) that outlines the appropriate uses of data.

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.

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

4.2. A Privacy Act Statement will be provided to property owners before any personal information is collected. This statement will be delivered either through verbal communication during in-person interactions or as a written document at the time of information collection. The statement will clearly outline the scope of information being collected, how it will be used and the individuals' rights regarding their data. What options are available for individuals to consent, decline, or opt out of the project?

Property owners can choose to provide their information. However, if they choose not to provide it, the USDA will not be able to carry out activities on their property. If they do choose to consent to USDA activities on their property, all information requested from them is required.

4.3. **Privacy Impact Analysis**: Related to notice.

Follow the format below:

Privacy Risk: There is a risk that property owners will not be aware of how their data is being processed.

Mitigation: APHIS PPQ obtains permission before surveying pests on private property. Notification about data collection is provided through verbal explanations, printed handouts, or written notices left at properties. These communications explain how the collected information will be stored in IPHIS.

Section 5: Data Retention

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

5.1. What information is retained and for how long?

APHIS is currently developing the record retention schedules for the files within IPHIS. .

Until approved by the National Archives and Records Administration (NARA), electronic systems are classified as permanent in accordance with unscheduled records management policy.

5.2. 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

5.3. **Privacy Impact Analysis**: Related to retention of information.

Follow the format below:

Privacy Risk: The indefinite retention of data while awaiting NARA approval increases the risk of unauthorized access to or misuse of information.

Mitigation: USDA implements multiple protective measures including: (1) requiring authenticated access via eAuthentication with user ID and password. User permissions are strictly limited based on job roles and responsibilities. While awaiting NARA approval of the retention schedule, only the minimum amount of information necessary to track plant health events is maintained in the system as authorized under the Plant Protection Act, the Honeybee Act and the Food Conservation and Energy Act.

Section 6: Information Sharing

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

6.1. 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?

Information is not shared internally.

6.2. **Privacy Impact Analysis**: Related to internal sharing and disclosure.

Follow the format below:

Privacy Risk: While information from IPHIS is not shared internally, there is always the risk of unintended or non-legitimate disclosure. Users with system access could potentially view information beyond what is necessary for their job duties or share information inappropriately with other internal staff.

Mitigation: Access to the application must be authenticated via USDA eAuthentication requiring user ID and password. Privileges and permissions assigned to enter, view, update, modify, or delete the information given to individual user accounts are based on their job's roles and responsibilities. Additionally, all users receive the annual USDA Information Security and Awareness Training which describes proper information sharing.

6.3. 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?

Information is shared with: State and county Cooperators (names, addresses, phone numbers, location data for pest management and emergency response); DHS/CBP (personal data of compliance agreement signers for regulated garbage monitoring); Other Federal Agencies (location data only, for environmental decisions); Diagnostic labs (sample information, no personal data except collection locations); and Academic Institutions site data, no personal except locations). Information is transmitted via encrypted email in most cases. State and local cooperators may also access IPHIS directly using USDA authentication credentials.

All sharing complies with SORN purposes and is authorized under relevant legislation.

6.4. **Privacy Impact Analysis**: Related to external sharing and disclosure.

Follow the format below:

Privacy Risk: There is the risk of the unauthorized or unintended disclosure of personal information during external sharing.

Mitigation: Information is only shared with external parties that have a need to know as outlined in the SORN and as authorized under the Plant Protection the Food Conservation and Energy Act of 2008. MOUs (memorandum of understanding) are in place with all third parties receiving IPHIS. State cooperators accessing the application must use USDA eAuthentication with user ID and Password. User permissions are restricted based on position responsibilities and need to know. All information shared via email is encrypted.

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.

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

Individuals can submit Privacy Act requests to gain access to their information. All requests for access to records must be in writing and should be submitted to the APHIS Privacy Act Officer, 4700 River Road Unit 50, Riverdale, MD 20737; or by fax ((301) 734-5941); or by email (APHISPrivacy@usda.gov). The request must include the full name of the individual making the request, the name of the system of records, and preference of inspection, whether in person or by mail. Prior to inspection of the records, the requester shall present sufficient identification (e.g., driver's license, employee identification card) to establish that the requester is the individual to whom the records pertain. Requestors may also submit Privacy and Freedom of Information Act (FOIA) requests through the online portal at https://efoia-pal.usda.gov/App/Home.aspx. Additionally, all individuals who submit information to PPQ have a PPQ contact with whom they can request to access their information directly.

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 APHIS Privacy Act Officer at the address above. The request should include the reason for contesting the record and the proposed amendment to the information with supporting documentation to show how the record is inaccurate. Additionally, individuals may contact their PPQ contact and ask them to correct their information directly.

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

Publication of the Systems of Records Notification (SORN) provides information on access and amending information collected in IPHIS. APHIS also posts information publicly on its website on how to submit Privacy Act Requests and FOIA requests. Additionally, landowners whose property are the subject of plant regulatory activity are notified by their PPQ contact to always remain in contact with them and provide updates to information as needed. In cases where a PPQ agent surveying a property does not make direct contact with a landowner, they leave a flyer at their property with their contact information. Cooperative agreements include the requirement for cooperators to keep the contact information of their representative up to date and provide information and contact information on how to do so.

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

N/A

7.5. **Privacy Impact Analysis**: Related to redress.

Follow the format below:

Privacy Risk: There is a risk that individuals will not be aware of the opportunities or procedures to access and/or correct their data.

Mitigation: Individuals are provided with a mechanism to request access to their information and correct it, if necessary, through Privacy Act Requests and FOIA Requests, as described above. This mechanism is outlined on publicly facing websites and within the SORN as described above. Additionally, individuals may contact their PPQ point of contact directly and request that their information be updated. The contact information is provided to property owners at the time PPQ visits their property and is included in the compliance agreements with individuals who are signing them on behalf of their organization.

Section 8: Auditing and Accountability

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

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

The information in IPHIS is secured in several ways. IPHIS is configured on a Web Application Firewall and the system is accessed through USDA eAuthentication. A web application firewall filters, monitors and blocks network traffic to and from the application in order to safeguard it from malicious traffic, identify potential security breaches and enforce security policies. IPHIS also utilizes system roles assigned based on an individual's job responsibilities which further secures the data. There are different roles in the system which once requested are reviewed and granted on a need-to-know basis. Specific roles allow users to view data, edit data and review and approve requests based on job responsibilities. The system logs changes that are made, and these audit logs can be reviewed if needed. PPQ employees also complete annual training in records management and information security. Personnel security policies are implemented and followed as part of the baseline security requirements.

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

Role based access controls and personnel security policies are implemented and followed as part of the baseline security requirements. Managers review the access and roles requested by employees and then confirm to the system administrator(s) that access can be granted. Users are first required to have eAuthentication credentials before requesting access to IPHIS. Once eAuthentication credentials are issued, the user makes an initial request to log in to IPHIS for a specific office and user role. A security officer defined for the office reviews the request, confirming the request with a supervisor associated with the office, before granting access. Moreover, a position sensitivity matrix was developed and continually maintained to determine whether access is required and the appropriate level of access if it is deemed necessary. APHIS has written procedures to confirm user roles and access needs

8.3. How does the program review and approve information sharing requirements?

Cooperators summarized in Section 6.3 may receive shared information from IPHIS when needed to facilitate plant pest mitigation activities. PPQ would evaluate information-sharing requests determining the requestor's need and role in the plant pest response. A review is conducted by a PPQ employee (officer or manager) in the state associated with the cooperator who has knowledge of the pest mitigation activities.

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

All APHIS personnel and contractors are required to complete the Information Security Awareness training annually.

Privacy Impact Assessment Review

[USDA Privacy Office completes this section.]

Date reviewed by USDA Privacy Office: 7/28/2025

USDA Privacy Analyst (On behalf of USDA's Chief Privacy Officer):

TRACY HENDRIX Digitally signed by TRACY HENDRIX Date: 2025.07.28 14:05:21 -04'00'

Signed:____________________________________

Signature of Responsible Officials

The individuals below attest that the information they provided in this Privacy Impact Assessment is true and accurate.

Signed:____________________________________

Amy Sisson
IPHIS System Owner
APHIS
U.S. Department of Agriculture

Signed:____________________________________

Angela Cole
Assistant Chief Information Security Officer (Acting)/Assistant Privacy Officer
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