



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	Veterinary Health Export Certificate System (VEHCS)
Program Office	Veterinary Services (VS)
Mission Area	Marketing and Regulatory Programs (MRP)
CSAM Number	2661
Date Submitted for Review	October 20, 2025

Mission Area System/Program Contacts

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Abstract

The Veterinary Export Health Certificate System (VEHCS) facilitates the creation of animal health certificates (HCs) for exporting live animals and germplasm. Accredited veterinarians (AVs) use the system to create and submit animal health certificates for exporting animals and germplasms to foreign countries. VEHCS collects the name, email address, license number and accreditation number of the AVs, as well as the business address, business phone number and business fax number of their veterinary practice. It also collects the name and address of the consignors and consignees and the name of the APHIS Veterinary Medical Officials (VMOs).

Overview

VEHCS supports Veterinary Services (VS) in creating and endorsing animal health certificates for exporting live animals and germplasm. VEHCS enables AVs to create and submit HCs, and APHIS Veterinary Medical Officials (VMO) to review and endorse them. AVs can then download copies of their certificates to use for the export.

VEHCS collects the personally identifiable information (PII) of the AVs, as well as the consigners and consignees of export shipments and the APHIS VMOs. Information in the system is shared with federal, state, local and foreign animal health agencies in cases where animals need to be traced, such as in a violation of animal laws and/or regulations. VEHCS is used to process over 160,000 certificates annually. Information in VEHCS is authorized to be collected under the Animal Health Protection Act.

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.

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

VEHCS is classified as a Moderate system. It received an ATO on 8/24/2024 and expires on 8/24/2027. The System Security Plan (SSP) was signed on 07/19/2024. The last risk review was completed on 6/29/2024.

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

Information in the system is retrieved by the certificate number, and not a unique personal identifier. Therefore, a SORN is not required.

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

Yes, and the OMB control numbers 0579- 0020, 0036, 0048, 0101, 0156, 0278, and 0432 are used to collect information for the system.

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

- Professional License 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

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

The AVs provide their own information (name, email address, license number and accreditation number, as well as the business address, business phone number and business fax number of their veterinary practice). They also provide information of the consignors and consignees (name and address). The APHIS VMOs provide their own information (name and title).

How is the information collected?

The AVs enter the information directly into the system. The APHIS VMOs also enter their name and title into the system as part of their user profile.

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

Not Applicable. The system does not use commercial or publicly available data.

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

The VS Headquarter management is responsible for ensuring VMO data is accurate and current. Accuracy is also confirmed since the applicant, which is the source of their PII, completes the application for the certificate. VS manually checks the AV information on submitted certificates by referring to accreditation data housed in a separate VS database (Veterinary Services Process Streamlining (VSPS)) to ensure accuracy.

If VS notices an error, they reach out to the AVs to update the information.

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 that PII will be collected that is not necessary for the purpose of this system and that it will be inaccurate.

Mitigation: The system collection fields only allow for the minimum amount of information to be collected to fulfill the intended purpose. AVs are the source of their own PII and enter this information directly into the system. The USDA verifies the information of the AVs by cross referencing it with the information in another VS system (VSPS).

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?

Data is collected for the creation of animal health certificates required to export live animals outside of the U.S. The PII of the AVs is used to certify their accreditation and reach out to them with any questions. The PII of the consignors/consignees is used to understand where the animals or germplasms are being shipped to/from. The name of the APHIS VMOs provides accountability and validation of the export certificates. All the above PII is also required to print out on the certificates themselves.

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.

VEHCS itself does not have a search/query tool for a predictive pattern or anomaly.

Privacy Impact Analysis: Related to uses of the information.

Follow the format below:

Privacy Risk: There is the risk of PII data being accessed by unauthorized personnel and of it being used outside of its intended purpose.

Mitigation: Only users who are authenticated and designated as active are permitted access to the system. Access privileges are determined by role-based or feature-based access control, which specifies what actions users can perform within the system. This ensures that the data can only be used as intended by those with those access roles. These access rights are assigned based on the specific responsibilities of each individual. All users receive the annual USDA Information Security Awareness Training which covers the proper uses of customer 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?

Both the online application and online [reference guides](#) describe the purpose of the data collection and how the information will be used. This PIA also serves as notice to the public.

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

AVs requesting export certificates must provide all the information requested for the certificates to be issued. All the information collected is necessary to process and issue the certificates.

Privacy Impact Analysis: Related to notice.

Privacy Risk: There is a risk that individuals will not be aware that their data is processed within VEHCS.

Mitigation: Both the application where AVs fill in their information and the VEHCS online guides provide explanations for how the information collected will be used. This PIA also serves as notice to the public.

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?

Paper records are retained for four years. Electronic content in this system is currently unscheduled. This content is in the process of being scheduled due to changes in record keeping practices.

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.

The [DISPOSAL AUTHORITY NC1-310-77-2](#) covers the paper records within the VEHCS system. The electronic information in system is currently unscheduled. This content is in the process of being scheduled due to changes in record keeping practices.

Privacy Impact Analysis: Related to retention of information.

Privacy Risk: There are risks related to long-term retention of unneeded or outdated PII from a security perspective, as the longer information remains in the system, the more likely it is to be compromised.

Mitigation: Access to data is based on roles assigned on a need-to-know premise. Role-based security and access rights are implemented to protect the confidentiality of information. Data is encrypted while in transport and at rest, which ensures an extra layer of security on the data by making it unreadable to unauthorized users. The VS Team is working to establish a records retention schedule to reduce the amount of data maintained in the system long-term.

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?**

Information is not shared internally.

Privacy Impact Analysis: Related to internal sharing and disclosure.

Privacy Risk: N/A (information is not shared internally)

Mitigation: N/A (information is not shared internally)

**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?**

The completed certificates are made available online using the [VEHCS certificate viewer webpage](#). Certificates can be searched and downloaded using both the certificate number and country of destination. This allows any party in the export chain (including customs officials, import country regulators, veterinarians, shippers, etc.) to verify the authenticity of an animal health certificate.

The information in the system may also be shared with Federal, state, local and foreign animal health agencies in cases where animals need to be traced, such as in violation of animal laws and/or regulations. The information shared may include the PII of the AVs, so they can be contacted about the specific case. The information is shared via encrypted email.

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk: The privacy risks with external sharing are unauthorized access or disclosure of information.

Mitigation: All information shared directly with Federal, state, local and foreign animal health agencies is encrypted, which makes it unreadable if intercepted by an authorized individual. The publicly available certificate viewer requires the searcher to know both the certificate number and country and has a CAPTCHA in place to submit a search. This reduces the risk of automated bots scraping information from the site.

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 can access their information directly in the system. They can also submit Freedom of Information Act (FOIA) requests using the [online portal](#) or to:

APHIS Privacy Act Officer
Legislative and Public Affairs, APHIS
5601 Sunnyside Ave. Ap-740
Beltsville, MD 20705.

What are the procedures for correcting inaccurate or erroneous information?

Individuals can update their information directly in the system. They can also reach out to the VEHCS HelpDesk at pcithelpdesk@usda.gov.

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

The system provides on-line help for correcting information for all users at the [Manage Account](#) resources and additional information for AV users at [Manage Account for AV Users](#). The contact information for the [VEHCS HelpDesk is also provided in the Frequently Asked Questions \(FAQs\) document posted online](#).

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

Redress 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 access and update their information directly in the system. Individuals may also submit Freedom of Information Act (FOIA) requests or can reach out to the VEHCS Helpdesk directly. Individuals are notified of these procedures within this PIA and in several online resources listed above.

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?

The system provides technical safeguards to prevent the misuse of data and APHIS conducts continuous monitoring for the system to ensure the technical safeguards are in place. The technical safeguards include, but are not limited to:

- **Encryption:** Encryption is implemented to secure data at rest and in transit for the application, which ensures that information will remain unreadable to unauthorized users.
- **Access Control:** Role/feature-based access is used to ensure staff only receive access to limited data that they need to carry out their work responsibilities.
- **Authentication:** Access to the system requires authentication. Session timeout is implemented to reduce the risk of someone gaining unauthorized access to an unattended workstation.
- **Audit:** Logging is implemented for this application (date/time of the last record update, user that last updated the record, etc.) and the logs can be reviewed if information is mishandled.

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

Only users who are authenticated and designated as active are permitted access to VEHCS. Access privileges are determined by role-based or feature-based access control, which specifies what actions users can perform within the system. These access rights are assigned based on the specific responsibilities of each individual. The program approves access and roles in the system. APHIS VEHCS staff view only information within their duty station or field office location.

External users (applicants/AV) logging into VEHCS are not vetted by VS directly; however, AV users submitting certificates to VS must enter their name and accreditation number, which are verified as part of the certificate review process. In addition, external users must still log in using eAuthentication/login.gov as per agency requirements. Applicants and AVs see only the data related to their own applications.

The process for granting access to USDA team members and to AVs is documented.

How does the program review and approve information sharing requirements?

The VEHCS System Owner reviews any requests for information sharing and approves them if there is a legal authority to share and necessity to share that is in line with the purpose of the original collection.

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

As part of the access control process, all users are required to take the annual Information Security Awareness Training that educates them on the proper handling and protection of PII data. This is required for both initial and continued access to the system.