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	VS LIMS
Program Office	Veterinary Services
Mission Area	MRP
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Mission Area System/Program Contacts

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Abstract

The USDA Veterinary Services (VS) Laboratory Information Management System (LIMS) is used by the National Veterinary Services Laboratories (NVSL) for tracking animal disease testing and results and distributing reagents. Individuals (veterinarians, individuals at accredited labs, research institutions, etc.) submit forms via mail, fax, email or the NCAH portal to request reagents or to accompany animal samples that they mail to the USDA. The submitters can then view the results of the lab testing in the Searchable Test Result Application for NVSL Diagnostics (STRAND), which is part of LIMS. VS LIMS collects the personally identifiable information (PII) of the individuals submitting the sample information or requesting the reagents (name, address, email address, phone number, fax number, signature, submitter ID and payment information), as well as the owners of the animals being tested (name and premises ID).

Overview

Disease prevention is the most effective method for maintaining a healthy animal population and for enhancing the United States' ability to globally compete in the trade of animals and animal products. Animal disease prevention cannot be accomplished without the existence of an effective disease surveillance program. This function is carried out by the Animal and Plant Health Inspection Service (APHIS) Veterinary Services program.

The National Veterinary Services Laboratories safeguard U.S. animal health and contribute to public health by ensuring that timely and accurate laboratory support is provided by their nationwide animal-health diagnostic system. As part of its mission, NVSL accomplishes this by providing diagnostic services and reagents. Diagnostic services range from a single laboratory test to comprehensive laboratory services covering many pathogens for a suspected disease outbreak. Diagnostic reagents are produced by NVSL as needed for veterinary diagnostic use when a commercial source of reagent is not available or when commercial sources are not fulfilling diagnostic needs.

Individuals submit forms electronically through the National Centers for Animal Health (NCAH) Portal or via physical paper forms. All incoming specimen and reagent forms are added into VS LIMS. Paper forms are scanned into LIMS. Electronically filed forms are pushed via system interconnection.

Information from the NVSL form entered into the LIMS includes test results, submitter, animal owner, financial information, agent and reagent inventory samples, and sample information. Each submission is queued for diagnostic testing or reagents. Once the testing is complete, information from the diagnostic reports containing official diagnostic results is added in VS LIMS. USDA employees enter data from laboratory records in the VS LIMS application. LIMS captures the tests results as well as a chain of custody to ensure the testing was appropriately conducted. Regulations and laboratory accreditation requirements include chain of custody requirements that require owner/submitter name to be included on official reports and tracked alongside the life of the sample.

Test results are released to submitters in real-time via the Searchable Test Result Application for NVSL Diagnostics (STRAND), which is part of LIMS and owned by NVSL. End users register for an account and the list of recipients (for test results for example) is defined by the internal NVSL LIMS system users.

Customers can only view results associated with and linked to their submission. STRAND contains all information released on reports from the NVSL including submitter, owner, animal, and test result information. Automated reports are delivered via email or fax when authorized for release. Reports can also be mailed or emailed.

The information collected in VS LIMS is authorized under the Animal Health Protection Act, and under Title 7, Chapter 9 (Detection, control and eradication of diseases and pests) of the U.S. Legal Code. VS LIMS contains PII of around 30,000 individuals.

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 collection of data in VS LIMS is authorized under:

- The Animal Health Protection Act
- U. S Legal Code: Title 7, Chapter 9 §8308 (Detection, control and eradication of diseases and pests)

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

Yes:

- The Security Plan Status Date: Signed 5/4/2023.
- The Authorization Status: Authorization to operate (ATO) renewed 4/26/2023 – 4/26/2026.
- The FIPS 199 classification of the system: MODERATE

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

APHIS-19 Laboratory Information Management System

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

Yes, the following forms, in paper and electronic format, are used to collect information:

- VS 10-4 – General Specimen Submission (OMB No. 0579-0090)
- VS 10-3 – Request for Salmonella Serotyping (OMB No. 0579-007)
- VS 10-7 – Specimen Collection Bovine Tuberculosis, Reactors, Suspects and Trace-Exposed (OMB No. 0527-0146)
- VS 5-38 – Parasite Submission Form (OMB No. 0579-0090)
- VS 6-35 – Report of Thoracic Granulomas in Regular Kill Animals (OMB No. 0579-0146)
- VS 4-54 – Brucellosis Test Record Market Cattle Testing Program (OMB No. 0579-0047)
- VS 5-14 – Dip Sample Data
- VS 17-31 – Equine Import Testing Submission
- VS 4-9 - Request for Regents or Supplies (OMB No 0579-0430)
- VS 4-10 - NVSL Customer Contact Information Update

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
- Credit/Debit Card number
- Business Credit Card number (sole proprietor)
- Personal Mobile number

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

Distinguishing Features

- Signatures

The Premises ID and Submitter ID are unique identifiers that are captured in the system.

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

Individuals included in this system include entities such as sample submitters, animal owners, NVSL or USDA personnel who handle the submission, and any approved non-USDA veterinarians coordinating with USDA to protect animal health. This includes, but is not limited to State, Tribal, and local government veterinarians.

These submitters provide their own name, email address, submitter ID, mailing address, phone number, fax number, signature and credit card information (depending on who is making the payment). They also provide the name, premises ID, and credit card information of the animal owners (depending on who is making the payment).

How is the information collected?

The information is collected directly from the individuals, of which the agency form number and OMB control number are listed in question 1.4. Individuals either fill out the forms electronically using the USDA National Center for Animal Health (NCAH) Portal or on paper versions of the forms that they mail in along with any samples submitted. USDA employees

then manually enter the information into the system. When the submission forms are received via mail, the USDA employees enter the data into LIMS and then scan and upload an electronic copy of the form. Hard copies of paper forms are retained in a security-controlled room.

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

No

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

Lab Managers will check for accuracy by reviewing submission documents and test results documents that were entered into the system by a clerk or technician. The checks will be done when all testing is completed and before they generate the report. This verification process includes reviewing and checking the PII and lab results together. This is documented in internal Standard Operating Procedures (SOPs).

Data is periodically audited by external auditors conducting peer reviews or accreditation audits to ensure the NVSL is adhering to strict International Organization for Standardization (ISO) accreditation standards. These requirements include maintaining accurate data.

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 though the use of third-party websites?

N/A

Privacy Impact Analysis: Related to characterization of the information.

Privacy Risk: There is the privacy risk that more information than necessary is collected to facilitate disease surveillance, and that the information will contain inaccuracies.

Mitigation: Only the minimum amount of PII is collected to fulfill the purposes of the system as outlined in the System of Record Notice (SORN). The PII is collected directly from individuals who fill out the forms listed in question 1.4 of this PIA. The information that is entered into the system, including the PII, is checked by a lab manager to confirm accuracy, as part of internal documented Standard Operating Procedures (SOPs). The process for checking data for accuracy is also audited by third-party ISO accreditation auditors. There is a desk audit on even years and an onsite audit on the odd years.

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 animal disease surveillance program is based on the information submitted through the submission forms. NVSL requires the submission of specimens with appropriate forms to ensure proper identification of the samples. The PII collected and maintained in LIMS is necessary to conduct business and to satisfy the diagnostics and surveillance piece of the VS mission. Each specimen for laboratory analysis must be accompanied by the appropriate documentation to identify the point of contact, as well as the animals and herds from which the specimens were taken. The PII identifies where samples are from, who submitted them and who the owner of the animals is, along with their contact information, in order to share the test results with them. The payment information is used to process payments to cover the cost of the sample testing. When individuals request reagents, the PII is used to mail the reagents to them, to reach out if there are any questions about their request and to process payments to cover the costs of the reagents. The information is critical to effectively operate a disease surveillance program.

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.

No

Privacy Impact Analysis: Related to uses of the information.

Privacy Risk: There is the privacy risk that the information may be used beyond diagnostic testing for disease surveillance or issuing reagents

Mitigation: The information collected is used only for the intended purposes of the system and as outlined in the SORN. Users are trained and are required to formally confirm that they understand the value and sensitivity of data in the system. The training includes information about limiting the use of information to only its intended purposes. The unauthorized use of data is also mitigated by access controls:

- All access to the data in the system is controlled by formal authorization. Each individual's supervisor must identify (authorize) what functional roles that individual needs in the LIMS system.
- All access to the system is limited by username and password as well as two-factor authentication.
- Access to information in the system is controlled using role-based access that limits access to relevant information and prevents access to unauthorized information.

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?

The System of Record Notice (SORN) (APHIS-19 Laboratory Information Management System) and this PIA provide notice to individuals of the types of information the system processes and the purpose. Privacy Act statements are in the process of being developed for paper and electronic forms that collect information for the system.

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

Individuals are not compelled to submit samples to the laboratory or request reagents, but if information is not submitted, services will not be provided by APHIS. Individuals that do submit samples to be tested at the laboratory or request reagents must submit all data, as all collection fields are required to assign appropriate tests, report results, mail the reagents and facilitate payments for the tests and reagents.

Privacy Impact Analysis: Related to notice.

Privacy Risk: There is a risk that individuals submitting samples or information to the laboratory may not receive adequate notice about the collection, use, storage, sharing and retention of their personal information in the LIMS system, preventing them from making informed decisions and exercising their privacy Act rights.

Mitigation: This PIA, the SORN and associated Privacy Act Statements provides public notice to individuals about the types of information in LIMS and how it is used.

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?

In accordance with the Federal Records Act (FRA) LIMS records will be retained indefinitely until NARA approves the proposed retention schedule. Under the proposed schedule submitted for NARA approval, paper records would be retained for a minimum of 3 years, electronic data would be maintained in the system for 25 years and would be archived at 5-year intervals. All types of data within LIMS would be subject to this retention period.

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 they are submitted and approved by NARA, electronic systems are classified as permanent in accordance with unscheduled records management policy.

Privacy Impact Analysis: Related to retention of information.

Privacy Risk: Retaining PII indefinitely, while awaiting NARA approval, raises the risk of unauthorized access.

Mitigation: The proposed LIMS retention period is consistent with the concept of retaining data only for as long as necessary to support NVSL' mission and core functions. The proposed retention schedule is based upon a need to keep the records available in case there are any questions or complaints. Archiving the records every five years reduces the number of people who can access older files, reduce the risk of unauthorized access and keep them available if needed. The proposed schedule complies with the requirements of the FRA and the stated purpose and mission of NVSL. Until a NARA-approved retention schedule for LIMS is complete, APHIS plans to maintain all records indefinitely in accordance with the FRA, which prohibits agencies from destroying records without a NARA-approved 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?

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?

N/A Information is not shared externally

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk: N/A Information is not shared externally

Mitigation: N/A Information is not shared externally

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 seeking access to his or her APHIS records by filing a Privacy Act or Freedom of Information (FOIA) request. Only U.S. citizens and lawful permanent residents may file a Privacy Act request. Any person may file a FOIA request. USDA offers several avenues to request access to their records. Individuals may submit a request online through USDA's FOIA and Privacy Act Web Portal, or through mail or fax:

USDA – Animal and Plant Health Inspection Service
FOIA/PA Director
4700 River Road, Unit 50
Riverdale, MD 20737
Fax: 301-734-5941

Further information about Privacy Act and FOIA requests for APHIS records is available at APHIS Freedom of Information Act home page.

What are the procedures for correcting inaccurate or erroneous information?

Inaccurate data are corrected by submitting requests to the Information Management group at the NVSL laboratory (NVSLinfo@usda.gov) or by submitting the VS Form 4-10 (NVSL Contact Information Update Form). The approval of the laboratory manager is required for corrections to be made, and detailed auditable records are produced when changes are made identifying who authorized and made the change, and when it was made. An individual may also correct his or her records by filing a Privacy Act request. The request should clearly state the information that is being contested, the reasons for contesting it, and the proposed amendment to the information. The procedures to submit Privacy Act requests are listed in the prior question.

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

The NVSL website includes outreach materials and contact information, including a "Contact the NVSL" page which displays where individuals may direct any inquiries. Additionally, NVSL posts the Contact Information Update Form (VS Form 4-10) on its website. The form itself includes instructions on how to submit it in order to update one's PII. The USDA/APHIS – 19 Laboratory Information Management System SORN also provides individuals with guidance regarding the procedures for correcting information. This PIA also provide notice to individual about the procedures for correcting their information. Additionally, APHIS notifies individuals the Privacy Act and FOIA procedures on the APHIS FOIA/Privacy Act website as listed above.

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

N/A: Formal redress procedures are 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 if it's incorrect.

Mitigation: Individuals may submit requests to update their information directly with the NVSL labs by emailing NVSLinfo@usda.gov. Additionally, the USDA provides for mechanisms for individuals to submit FOIA and Privacy Act requests. Instructions for all of these request types are listed online, as mentioned 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?

VS LIMS includes an audit trail capability to monitor user activities and generate alerts for unauthorized access attempts. Auditing is enabled both at the application and database level. The audit records are monitored to ensure the proper use of the system. On the logon page, individuals are required to read and acknowledge a logon warning banner that describes the conditions of use and access, as well system monitoring. The banner defines the consequences of authorized and unauthorized access.

Data can be retrieved only by personnel who successfully authenticate using their eAuthentication PIV or Login.gov/eAuthentication username/password and with assigned roles that limit their access to information to only what is relevant for their job responsibilities.

All the information in VS LIMS is encrypted, which ensures that it will remain scrambled and unreadable if intercepted.

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

New users request access to the system through the USDA User Management System (UMS). Once the individual's manager approves the request, it is forwarded to a LIMS administrator who grants access to the system and assigns a role. VS LIMS deploys user role-based access controls and enforces a separation of duties to limit access to only those individuals who have a need-to-know to perform their duties. Each operational role is mapped to the set of system authorizations required to support the intended duties of the role. The mapping of roles to associated authorizations adheres to the principle of least privilege. Authorized users are broken into specific classes with specific access rights. This need-to-know is determined by the respective responsibilities of the employee.

How does the program review and approve information sharing requirements?

For any new information sharing requests, discussions are held between the System Owner and Information System Security Officer to determine the requirements. For any approved new sharing, an interconnection security agreement or memorandum of understanding will be developed and signed by the Authorizing Official for Veterinary Services.

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

All users receive the annual information security awareness training and are required to sign rules of behavior before being given access to the system.