



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.”

Table of Contents

Privacy Impact Assessment for the USDA IT System/Project	3
Mission Area System/Program Contacts	3
Abstract	4
Overview.....	4
Section 1: Authorities and Other Requirements	5
Section 2: Characterization of the Information	7
Section 3: Uses of the Information	9
Section 4: Notice	10
Section 5: Data Retention	11
Section 6: Information Sharing.....	12
Section 7: Redress	13
Section 8: Auditing and Accountability	15

Privacy Impact Assessment for the USDA IT System/Project

Detail	Information
System/Project Name	VS NCAH on Azure Platform (NAP)
Program Office	Veterinary Services
Mission Area	APHIS
CSAM Number	1226
Date Submitted for Review	-

Mission Area System/Program Contacts

Role	Name	Phone Number
MA Privacy Officer	Angela Cole	2024656265
Information System Security Manager	Erica Alston	301-851-3106
System/Program Managers	Mark Pagala	515-337-6212

Abstract

The USDA National Centers for Animal health (NCAH) Portal is used to intake information for the Center for Veterinary Biologics (CVB) Licensing Serial Release & Testing Information System (LSRTIS) and the National Veterinary Services Laboratory (NVSL) Laboratory Information Management System (LIMS). Customers use the NCAH Portal to submit requests and view the status and results for veterinary biologics, requests for facility inspections and approvals, and animal biological sample testing. The NCAH Portal collects the personally identifiable information (PII) of customers, including veterinarians, animal owners and laboratory staff. This PII consists of their name, address, phone number, email address, educational and employment histories, and signature.

Overview

National Centers for Animal Health (NCAH) on Azure Platform (NAP) is composed of applications used primarily by NCAH employees that all reside within the Marketing and Regulatory Program (MRP) FedRamp approved Microsoft Azure Cloud. The purpose of the NAP information system is to use Azure to deliver and manage general capabilities to support day-to-day internal business operations for APHIS Veterinary Services (VS). The NCAH Cloud is one of these applications and is used to intake information for the LSRTIS and NVSL LIMS systems.

Customers, including sample submitters, veterinarians, animal owners, and laboratory staff use the system to submit various types of information and requests for CVB and NVSL, including the submission of biological sample data for testing, and requests for veterinary biologics. The PII includes names, email addresses, phone numbers, addresses, educational and employment histories and signature. The PII is transmitted directly into NVSL LIMS and LSRTIS and is not shared directly from the NCAH Portal to any other systems or organizations. The information collected in the NCAH Portal is authorized under a variety of legal authorities that CVB and NVSL operate under (these are fully listed below in question 1.1). The system contains the PII of around 50,000 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?

- Center for Veterinary Biologic (CVB)
 - The collection of information is authorized by the 1913 Virus–Serum–Toxin Act. Specific regulations are in Title 9, Code of Federal Regulations, Parts 101 to 123.
 - CVB enforces the Virus-Serum –Toxin Act (21 USC §151-159 et. seq.)
- National Veterinary Services Laboratory (NVSL),
 - The collection of information is authorized by U.S. Legal Code: Title 7, Chapter 9, #8308 is invoked to validate the collection of information and U.S. Legal Code: Title 7, Chapter 9 #8308: Detection, control and eradication of diseases and pests.
- NVSL provides testing under:
 - 9 CFR 53 (Foot-And-Mouth Disease, Pleuropneumonia, Rinderpest, and Certain other Communicable Diseases of Livestock or Poultry)
 - 9 CFR 56 (Control of H5/H7 Low Pathogenic Avian Influenza)
 - 9 CFR 82 (Exotic Newcastle Diseases and Chlamydiosis)
 - 9 CFR 94 (Rinderpest, Foot-and-Mouth Disease, Exotic Newcastle Disease, African Swine Fever, Classical Swine Fever, Swine Vesicular Disease, and Bovine Spongiform Encephalopathy: prohibited and restricted importations)
 - Animal Health Protection Act (7 USC Chapter 109)
 - Animal Welfare Act (7 USC 54)
 - Animal Health Protection (7 USC § 8308 Detection, control, and eradication of diseases and pests)
 - Homeland Security Presidential Directives (HSPD) 5 (Management of Domestic Incidents)
 - HSPD 7 (Critical Infrastructure Identification, Prioritization, and Protection)
 - HSPD 8 (National Preparedness)
 - HSPD 9 (Defense of United States Agriculture and Food)
 - HSPD 12 (Policies for a Common Identification Standard for Federal Employees and Contractors)

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

Yes. The system has an Authority to Operate until November 22, 2027.

- The Security Plan Status Date – November 1, 2024
- The Authorization Status - Valid

- The Authorization Date – 11/22/2024
- The Authorization Termination Date - 11/22/2027
- The Risk Review Completion Date – 11-14/202
- The FIPS 199 classification of the system - MODERATE

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

APHIS-19 SORN

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

For CVB, the following forms are covered by the PRA:

- APHIS Form 2020 (OMB Approved: 0579-0013)
- APHIS Form 2008 (OMB Approved: 0579-0013)
- APHIS Form 2007 (OMB Approved: 0579-0013)
- APHIS Form 2048 (OMB Approved: 0579-0013)
- APHIS Form 2049 (OMB Approved: 0579-0013)
- APHIS Form 2005 (OMB Approved: 0579-0013)

For NVSL, the following forms are covered by the PRA:

- VS Form 10-4 (OMB Approved: 0579-0040, 579-0090, 0579-0101, 0579-0146, 0579-0189, 0579-0485)
- VS Form 17-31 (OMB Approved: 0579-0040)
- VS Form 6-35 (OMB Approved: 0579-0146)
- VS Form 10-3 (OMB Approved: 0579-0007)

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?

Biographical Information

- Name (Including Nicknames)
- Business Mailing Address (sole proprietor)
- Business Phone or Fax Number (sole proprietor)
- Home Address
- ZIP Code
- Personal Email Address
- Business Email Address
- Employment Information
- Education Information

Distinguishing Features

- Signatures

Specific Information/File Types

- Academic/Professional Background Information

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

The source of the information in the system is the customers filling out the forms listed in question 1.4.

How is the information collected?

Customers electronically fill out the forms listed in question 1.4, which are embedded directly in the NCAH Portal. In some cases, submitters also email or physically mail these forms to the USDA, in which case USDA team members enter the information into the system manually. Paper forms are retained by CVB and the NVSL according to their individual record plans.

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

The NCAH Portal does not use commercial or publicly available data.

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

Fields within the NCAH Portal webpages contain data validation checks such as date/calendar fields when entering dates, and dropdown fields with standardized data, which reduces the risk of data entry errors or data being entered into the incorrect field. Data which requires manual entry (e.g. free text fields) is validated by the submitter during entry. Manually entered

data is also validated by USDA employees, who are trained in entering data accurately, before the information is used in the CVB Licensing Serial Release & Testing Information Service (LSRTIS) or NVSL Laboratory Information Management Service (LIMS) applications.

Submitters can update and change information prior to submission. If data inaccuracies are found, APHIS VS CVB employees may contact the submitter to validate the data and rectify the discrepancy, or the submission may be returned for correction. For data submitted to NVSL, data is processed as entered; any changes require the submitter to resubmit for any modifications to submissions.

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?

None

Privacy Impact Analysis: Related to characterization of the information.

Privacy Risk: There is a risk of unnecessary data being collected or of it being inaccurate.

Mitigation: Data is collected directly from the data subject and collection fields are limited to only what is necessary for the purposes of the system and as outlined in the SORN. The portal uses data validation fields, which reduce the risk of inaccurate data or data being entered into the incorrect field. VS employees are also trained in entering accurate data.

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 purpose of collecting the customer information in the NCAH Portal is to transmit it to the LSRTIS and LIMS systems where it will be used to process requests for biological regents and to communicate with them about biological test results and facility inspections.

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.

The NCAH Portal does not use technology to discover or locate predictive patterns or anomalies.

Privacy Impact Analysis: Related to uses of the information.

Privacy Risk: There is a risk of information being used outside of the purposes outlined in the SORN.

Mitigation: NCAH Portal has the following security controls in place to mitigate the risk:

- Roles and access to data are controlled and documented via formal authorization. Roles in the system are assigned based on an individual's work responsibilities.
- Access to the system is controlled by account identification and password (i.e. eAuth).
- USDA employees receive annual information security awareness training, which includes training on how to properly manage PII.
- A warning banner that indicates proper system usage and privacy expectations must be acknowledged prior to logging in to the system.

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?

Currently, some of the collection forms used in the NCAH portal contain Privacy Act Statements. There is an effort underway to add statements to any forms missing them, as well as to the online portal interface. This PIA and the SORN also serve as notice to the public.

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

Data submitted via the NCAH Portal is optional, but if individuals do not provide data via the NCAH Portal, services will not be granted. To use the services of CVB or NVSL, the privacy data outlined in section 2.1 is required.

Privacy Impact Analysis: Related to notice.

Privacy Risk: There is a risk of customers not understanding how the USDA uses the information collected in the NCAH Portal.

Mitigation: This PIA, as well as the SORNs listed in question 1.3, provide notice to the public. Currently, some of the intake forms for the NCAH portal include Privacy Act Statements. An effort is underway to add Privacy Act Statements for any forms missing them.

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?

Information is available in the NCAH Portal up to 90 days after submission. Submission data is removed after 90 days. NCAH Portal is not a system of records but rather a collection point. Data submitted via NCAH Portal is transferred into the LSRTIS and NVSL LIMS applications, which are the systems of record for this information and have their own record retention schedules.

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.

Records are retained in accordance with the General Records Schedule and or Agency Controlled Records Schedule. Temporary: Destroy when business use ceases. DAA-GRS-2013-0008-0003.

Privacy Impact Analysis: Related to retention of information.

Privacy Risk: There is a risk of data being retained longer than necessary.

Mitigation: The NCAH Portal has implemented a 90-day retention period, which reduces the risk of data being collected longer than necessary. This retention period has been approved by the APHIS records officer. The NCAH Portal's primary purpose is to receive data for the NVSL LIMS systems and LSRTIS, which are the official system of records for the data being entered into the portal. Each of these systems has their own retention period.

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?

None.

Privacy Impact Analysis: Related to internal sharing and disclosure.

Privacy Risk: N/A

Mitigation: N/A

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 not transmitted or disclosed to organizations external to the USDA.

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk: N/A

Mitigation: N/A

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 are generally directed to the system of records that the NCAH Portal feeds in order to access their information, as the data in the NCAH Portal is a temporary conduit to those systems. For information submitted to CVB, individuals may obtain information via the established government liaison assigned for their regulated veterinary biologic manufacturer. They may also update information directly in the NCAH Portal, email CVB.PIMS@usda.gov or request information via hard copy submission with a cover letter.

For information submitted to NVSL, individuals may update information directly in the NCAH Portal or via the [Contact Us page on the NVSL website](#).

Individuals can also submit [Freedom of Information Act \(FOIA\) or Privacy Act requests using the online portal](#) or to by sending a request to:

APHIS FOIA & Privacy Act Office
USDA APHIS LPA
5601 Sunnyside Ave,
AP-740
Beltsville MD 20705
Fax: 301-734-5941

[United States Department of Agriculture Freedom of Information Act Public Access Portal](#)

What are the procedures for correcting inaccurate or erroneous information?

Individuals who need to update their information are generally directed to re-submit their information in the portal or to the systems that the NCAH Portal feeds (LSRTIS and LIMS). They may also be directed to the originating lab that submitted the information when applicable. Individuals can also submit Privacy Act requests, as listed above.

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

This PIA and the SORN serve as notice to the public. For CVB, individuals are provided contact information online in the [About the Center for Veterinary Biologics](#) page and the [Contact the NVSL](#) page.

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

Not Applicable. 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 re-submit information directly on the portal. Individuals may also submit FOIA or Privacy Act Requests. Instructions on how to submit these are listed on the USDA website and within this PIA.

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?

Information in the NCAH Portal is secured in the following ways:

- All information in the NCAH Portal is encrypted, which makes it unreadable to unauthorized users.
- NCAH Portal user roles and access to data are controlled and documented via formal authorization (i.e. users can only gain access to the system and data after access is requested and approved).
- Identity verification and system access is controlled via USDA eAuthentication.
- Role-based access controls and separation of duties are implemented, which ensures that individuals only have access to information and functionality that they need for their work responsibilities.
- Audit logging is implemented (e.g. data is captured regarding who made changes to data, what data was changed, when changes were made, etc.). These 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?

USDA team members require supervisor and system owner approval before accessing the system. Access is role-based, which means that functionality and access to information is provided only for what users need to carry out their work.

For submissions to CVB, submitters must meet specific requirements before they are allowed to submit information to CVB via the NCAH Portal. These requirements include:

- The product is confirmed to be under regulatory jurisdiction of CVB.
- Product is intended for a disease for which CVB issues licenses or permits.
- Facility requirements and documentation have been submitted to CVB.
- A USDA establishment code has been assigned by CVB.
- Approval has been granted by CVB for the person(s) to submit via NCAH Portal.

Additional details for CVB access can be found at the [Eligibility Requirements for a New Establishment to Submit Via the NCAH Portal](#).

For submissions to NVSL, submitters must have an eAuth level 1 account.

Once approved, submitters have several different roles that can be assigned based on their specific job duties. A detailed listing of roles and rights can be found in the NCAH Portal Roles and Privileges Guide at [NCAH Portal roles and Privileges \(NCAH Portal User Guide #2 v.2\)](#)

The process for granting access to USDA users is documented.

How does the program review and approve information sharing requirements?

All information sharing requirements are reviewed by the system owner and ultimately approved by the business owner within CVP and NVSL. The information system security officer (ISSO) would also be consulted.

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

USDA employees receive annual information security awareness training, which includes managing and securing PII.