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 Integrated Surveillance Modules
Program Office	Veterinary Services
Mission Area	MRP/APHIS
CSAM Number	2327
Date Submitted for Review	-

Mission Area System/Program Contacts

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Abstract

This Privacy Impact Assessment (PIA) for USDA, Animal and Plant Health Inspection Service (APHIS), Veterinary Services Integrated Surveillance Modules (VSISM). VSISM is an enterprise-level (business-wide) animal health and surveillance electronic information management system. It provides an electronic means of data input, data transmission, data storage, and data reporting. This system enables APHIS to take a comprehensive and integrated approach to collecting and managing animal health data for disease management and surveillance programs. This PIA was conducted as the system collects the personally identifiable information (PII) for individuals who are the primary contacts for locations being tested or owners of animals being tested, including their name, email address, address, phone number and premises identification number as well as the PII of state animal health officials who work with the USDA on animal disease surveillance and mitigation efforts (name, address, phone number, and email address).

Overview

VSISM is an animal health and surveillance system which provides enterprise-level surveillance and animal health program data for numerous species and diseases to facilitate the detection, management, prevention, investigation, control and eradication of animal diseases. The VSISM maintains data on collection sites, animals, and specimen information, as well as conditions to test on the specimens, depending on the stream and condition of interest.

VSISM supports the Veterinary Services mission to protect and improve the health, quality, and marketability of our nation's animals by providing a nationwide repository of animal health and productivity information. VSISM also maintains the name, address, phone number and premises ID for individuals identified as contacts for premises (locations) and owners of animals or animal-related operations involved with the various programs. Because of the variable nature of the premises, including sole proprietorships, and the undocumented relationship of the contact to the premises, many of the contacts are private citizens.

VSISM is a “Major Application” with a FIPS-199 classification of “Moderate”. The information in VSISM is authorized to be collected under the Animal Health Protection Act, the Animal Damage Control Act, the Farm Security and Rural Investment Act, the Public Health, Security and Bioterrorism Preparedness and Response Act, the Code of Federal Regulations Title 9, parts 54 and 79 and the Farm Bills. VSISM contains the PII of roughly 1,000 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 Animal Damage Control Act of 1931, 7 U.S.C. 8301 et seq. of the Animal Health Protection Act
- The Animal Health Protection Act, 7 U. S. C. 8301-8317
- The Farm Security and Rural Investment Act of 2002
- Public Health Security and Bioterrorism Preparedness and Response Act of 2002 116 Stat 674-678
- The Homeland Security Presidential Directive 9
- Code of Federal Regulations Title 9, parts 54 and 79
- Farm Bills (Most recently extended December 2024) - an omnibus, multiyear law that governs an array of agricultural and food programs

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

Yes:

- The Security Plan: Updated and signed on 4/25/2024
- The Authorization Status: Renewed as of 5/16/2024, until 5/16/2027
- The Risk Review Completion Date: 5/13/2024
- The FIPS 199 classification of the system: MODERATE

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

APHIS-15 SORN is the official notice.

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

Yes, the VS Specimen Submission Form (VS Form 10-4. OMB #s 579-0040, 579-0090, 0579-0101, 0579-0146, 0579-0189, 0579-0485) is used to collect 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?

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

- 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
- Personal Email Address
- Business Email Address

Misc Other:

- Premises ID

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

The personal information (names, business email addresses, business address, and business phone numbers) is collected directly from the individuals who own the animals or own or operate the clinics, exhibitions, laboratories or market/concentration points where animal samples are tested. The premises ID is a unique identifier for each location being tested and is assigned by the VSISM system.

State employees working on animal disease surveillance activities provide their own PII. (names, addresses, phone numbers and email addresses).

How is the information collected?

Information is collected and manually entered into the application by federal employees and cooperating state employees.

The federal or state employees gather this information using a variety of methods:

- In-person: State or federal employees will collect data while visiting the premises. The data can be entered directly into VSISM while on site or it can be written on paper by the employee and transferred to VSISM when they return to their office. Paper artifacts created are considered a record. They are securely stored or destroyed according to Field Operations records retention policies.
- Mail: Premises contacts may submit data to state or federal employees on paper forms and mail them to the appropriate office. Upon receipt, state or federal employees will validate the submitted data and, if considered accurate, will manually enter the data from the form into VSISM.
- Email: Premises contacts may submit data to state or federal employees on electronic forms and email to the appropriate email address. Upon receipt of the email, state or federal employees will validate the submitted data and, if considered accurate, will manually enter the data from the form into VSISM.

State workers submit their own information via the USDA User Management System to be furnished with an account in VSISM and to be assigned a role in the system.

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

VSISM does not use commercial or publicly available data.

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

Data collected from customers is verified for accuracy, relevance, timeliness, and completeness by USDA and state employees at the time the data is collected. These employees are responsible for the review and accuracy of the data and checking data for accuracy is part of employee training, depending on the mission area of the program. Data fields are also set up in a way that reduces the likelihood that information will be entered into the incorrect field. Examples include date fields only allowing dates and menus using drop downs as opposed to free text when possible. This reduces the likelihood that PII will accidentally be entered into the incorrect field.

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: The collection of unneeded or extraneous PII, as well as information associated with or linked to individuals creates privacy risks. Additionally, inaccurate information about individuals poses risks related to the characterization and use of personal records.

Mitigation: Personal information and associated data are only collected and used for the intended purposes of the system as outlined in the SORN. The collection is minimized to only information required for the system's mission of testing and monitoring animal health. All personal information, whether direct identifiers or information associated with individuals, is collected directly from the data subjects and verified for accuracy, as part of training for USDA employees.

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 data in VSISM is used for routine animal health surveillance, management of domestic animal disease and pest control programs, and to monitor for and respond to the introduction of foreign animal diseases.

The PII specifically (names, addresses, email addresses and phone numbers of the premises/animal owners) is used to be able to understand the locations of animal disease events to help with mitigation efforts. It is also used to contact the owners of premises about activities on their properties and the owners of animals about their animal health statuses and animal test results.

The PII of the State Animal Health Officials (names, addresses, phone number and email addresses) is used to communicate with them about animal disease work and to be able to furnish them with accounts and assign them user roles in VSISM.

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 a risk that PII will be used outside of its intended purposes.

Mitigation: VSISM adheres to the APHIS-15 SORN how the information is collected and used. Only authenticated users are permitted access to VSISM. Access privileges are determined by role-based or feature-based access control, which specifies what actions users can perform within the system and what information they have access to. These access rights are assigned based on the specific responsibilities of each individual to ensure that they only have access to functionality and information needed for them to carry out their work.

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 APHIS 15 SORN and this PIA serve as public notice to individuals about the types of information collected in VSISM, the purpose of the collection, and how the information is used.

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

In order to participate in the program, individuals must provide the requested information, as is required for the USDA to carry out its work. If individuals choose not to provide their information, animal health services will not be provided. Also, individuals involved in animal disease investigations are required to provide information governed by specific animal health laws and regulations of the state in which they reside.

Privacy Impact Analysis: Related to notice.

Privacy Risk: There is a risk of the lack of transparency with individuals regarding the collection and use of their information if a Privacy Act Statement is not provided at the time of collection.

Mitigation: VSISM adheres to the APHIS-15 SORN which lays out the PII being collected as well as how it is used and is posted publicly online. This PIA also provides notice publicly to individuals. A Privacy Act Statement is currently being developed for all collection forms as well.

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 within the VSISM application are considered permanent until the records retention schedule is approved by NARA.

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 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: There are risks related to the long-term retention of unneeded or outdated information, both from a minimization and security standpoint, as longer information is retained, the less likely it is to be needed and the more likely it is to be compromised.

Mitigation: VSISM only collects the minimum amount of information needed to carry out the intended business purpose. Currently, all VSISM records will be permanently maintained until a NARA disposition schedule has been approved. All information in the system, including information being retained pending NARA approval, is secured as outlined in question 8.1 of this PIA.

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?

VSISM does not connect to any internal organizations or systems.

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?

PII is generally not shared externally outside of the USDA, beyond the State and local government users who are helping the USDA in disease surveillance and mitigation efforts. These individuals access the same information as USDA employees through direct access to the system. Additionally, there may be exceptional cases of external sharing, such as in a data breach or legal case, and these are outlined in the routine uses section of the SORN.

Privacy Impact Analysis: Related to external sharing and disclosure.

Privacy Risk: There is a risk of inappropriate use, retention, or further disclosure of personal information by external users.

Mitigation: All external users must request access through the USDA User Management System (UMS), and demonstrate a business need to access the system. A USDA supervisor must review the request and approve it before a system owner provides access. Roles are assigned in the system to state animal health officials that limit their access to information to only what they require for their official duties. For example, a state animal health official can only view information related to their state. All users are trained in information security before accessing the system, including the importance of maintaining the confidentiality of information.

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?

Any individual may obtain information from a record in the system that pertains to him or her by submitting a Privacy Act Request or Freedom of Information Act (FOIA) request. Requests may be submitted using the APHIS Privacy Act/FOIA Portal, via Phone: 301-851-4102, Fax: 301-734 –5941 or email: foia.officer@aphis.usda.gov. Requests may also be sent via mail. Requests for hard copies of records should be in writing, and the request must contain the requesting individual's name, address, name of system of records, timeframe for the records in question, any other pertinent information to help identify the file, and a copy of his/her photo identification containing a current address for verification of identification. All inquiries should be addressed to the APHIS Privacy Act Officer, Legislative and Public Affairs, APHIS5601 Sunnyside Ave. Ap-740 Beltsville, MD 20705. What are the procedures for correcting inaccurate or erroneous information?

If data is found to be inaccurate, the requestor is directed by the APHIS Privacy Act Officer to formally request correction by using the contact information listed above in question 7.1. Customers can also contact the APHIS or state office where they first provided the information and request correction of inaccurate or erroneous information.

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

Individuals are notified via this PIA as well as the System of Record Notice (SORN). Additionally, APHIS posts the instructions on how to submit FOIA and Privacy Act requests publicly on its How To Submit a FOIA Request to APHIS website.

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

N/A. A formal redress is provided.

Privacy Impact Analysis: Related to redress.

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

Mitigation: Individuals are notified of the procedures to correct their information in SORN and this PIA. Additionally, APHIS publicly posts instructions on how to submit FOIA and Privacy Act requests on its website, as 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?

All security controls are continually reviewed to maintain compliance with the Federal Information Security Modernization Act (FISMA). Some of the technical safeguards for VSISM use the Dynamics Customer Relationship Management security model that includes auditing, role-based views, field-level security, and division of security. This means any event, that creates, modifies, deletes, old and new values are audited at the field level, to identify the user who made a change to a record. Even the audit history on individual record and audit history summary is tightly controlled with separate security settings to protect the integrity of the log. The security model provides users with access only to the appropriate levels of information based on their role(s). Furthermore, views and field-level are role-based as well, preventing users from seeing, accessing, and/or making changes to individual fields or records to which they do not require access for their job function. Finally, access control is a combination of eAuthentication (user credential and authentication) and authorization (VSISM roles) which ensures that individuals only have access to information that they need 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 the VSISM is based on the need to conduct business with USDA and is approved by an authorized APHIS VS official. Criteria, procedures, and controls are documented. Access for federal employees or state workers must be requested through the USDA User Management System (UMS) and approved by the supervisor or APHIS authorizing official. The application owner then reviews the request, and if approved, provides access to the system.

Once access is authorized, users of VSISM information are further controlled through electronic role-based access, which ensures that they only have access to information that they need for their job responsibilities. For example, state animal health officials can only view information relevant to their state. The system is integrated with USDA eAuthentication application and requires level 2 authenticated access. Users must have a government issued login and password that is controlled and managed either at the Veterinary Services district or local VS offices. Password controls, procedures, responsibilities and policies follow USDA departmental standards.

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 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 Information Security Awareness training and are required to sign rules of behavior before being given access to the system. Additionally, all users review the training and sign rules of behavior on an annual basis.